

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N680166108

|                                   |                               |                           |
|-----------------------------------|-------------------------------|---------------------------|
| FACILITY: EnviroTech Coatings LLC |                               | SRN / ID: N6801           |
| LOCATION: 1900 Austin St, MIDLAND |                               | DISTRICT: Bay City        |
| CITY: MIDLAND                     |                               | COUNTY: MIDLAND           |
| CONTACT: Alan Popp, President     |                               | ACTIVITY DATE: 01/13/2023 |
| STAFF: Benjamin Witkopp           | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: Facility inspection      |                               |                           |
| RESOLVED COMPLAINTS:              |                               |                           |

On January 13, 2023 Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (AQD) conducted an inspection of Enviro Tech Coatings (ETC). It is located in a light industrial / commercial area east northeast of the intersection of Saginaw Rd. and Bay City Rd. in Midland County. It is best described as a coating job shop. The site operations consist of a fully enclosed blasting area, three traditional paint booths, and a powder coating operation. The facility is covered by air use permit 52-00C. The permit does include "opt-out" limits for both individual hazardous air pollutants (HAPs) and aggregate HAPs.

The office area is located upstairs in the north end of the west most building. Alan Popp is the owner of ETC. Greg Moore functions as the facility estimator / supervisor. Alan wasn't around at the time of the inspection. He had supplied records at the end of 2022. I asked Greg for the source of the various coatings volatile organic compound (VOC) and HAP content which are used in the record keeping. He confirmed they came directly from Air Quality Data sheets furnished by the coating supplier. We spot checked several of the coatings and found they matched the values in the records. The values for the individual HAPS were in units of pounds per gallon which made record keeping easier.

Greg and I started out at the north end of the west most building. Booth 2 is located in the middle of the building and Booth 1 is on the south end. The painting operations use high volume, low pressure (HVLP) spray equipment. Booth 2 has a south and north stack located on the west end of the booth. It is designed to allow two painting operations to occur at the same time. The rooms airflow can essentially be split in half and the painting on one side does not affect the other. Filters were in place but no painting was occurring at the time. Previously painted parts were drying in the booth. A worker was preparing pipes to paint.

A Wheelabrator shot blast unit is located in the middle of the east side of the building with the dust collector for it located outside. It was not operating at the time. Greg confirmed it is rarely used, as was the case in the past. The unit is exempt from permitting via rule 285 (2) (l) (vi) (C).

Booth 1 had its mat / panel filters in place but no painting was occurring. However, only about one half of booth 1 even existed. In place of the other half, a powder coating operation and cure oven had been installed. Greg said the oven measured 20 ft by 14 ft and was 8 ft tall.. The powder coating operation is exempt from permitting via Rule 287 (2) (d)

We went to the building on the east side of the site. It is known as the blast barn, where shot blasting occurs. The blast media is captured and recycled. The recycling equipment is in the west portion of the building. A dust collector is used for particulate control. A flatbed trailer was being set up for blasting. The barrels underneath the dust collector, located outside on the east side of the blast barn, were checked. The barrels needed to be emptied as shot dust had overflowed and started to pile up around the barrels. Greg apologized and said the material would be cleaned up.

The newest spray booth, known as booth 3, lies north of the blast barn. It uses three stacks. Two are on the north end at the west and east corner while the third stack is on the rooms southwest side. Each of the areas had filters in place and the areas could be operated independently. The fans could also be run on high or in cure mode. Parts that had been painted earlier were sitting there while curing. There were a few open containers of paint / solvent waste in the northeast portion. This was pointed out to Greg. He said he was having workers on site on Saturday and would have them clean up the booth 3 area as well as the barrels beneath the blast barn dust collector.

## RECORDS REVIEW

The first section of the permit deals with the newest booth, identified as booth 3. It has VOC limits of 3.0 tons per year (tpy), based on a 12 month rolling time period, and 2,000 pounds per month. Record keeping was checked for December 2022. The 12 month rolling time period showed 2.13 tons of VOCs. The highest pounds per month was 572.6 which occurred in August 2022.

The second section of the permit basically functions like a general coating permit since it has VOC limits of 10.0 tpy (12 month rolling time period) and 2,000 pounds per month for each line. The third section of the permit contains "opt-out" provisions covering hazardous air pollutants (HAPs) and VOCs. The limits found there concern the entire facility. Each hazardous air pollutant (HAP) is limited to less than 9.0 tpy. Aggregate HAPs are to be less than 22.5 tpy. Lastly, total VOC's are limited to 30.0 tpy. All of these limits are based upon a 12 month rolling time period.

Greg obtained Air Quality Data sheets from their suppliers. The information on those sheets makes record keeping easier, particularly so for the HAPs. Spot checking of material information did not reveal any constituents (e.g. cadmium, etc.) which would make the facility subject to additional requirements found in the National Emission Standards for Hazardous Air Pollutants Subpart HHHHHH for spray application of coatings to a plastic and/or metal substrate.

Booth 2 is used the most and that was reflected in the records. The emissions were below permitted levels. Booth 2 had a little over three tons of VOC for the latest 12 months while booth one had zero. Booth two's highest month had 834.6 pounds in August of 2022. The facility total was 5.14 tons of VOC for the latest 12 months.

HAPS were also checked for the 12 month rolling time period ending with December 2022. Toluene is the largest single HAP being emitted. Toluene emissions totaled 1.75 tons on a 12 month rolling time period. The emission of all HAPS aggregated was 3.15 tons. The emission amounts are well below the limits previously mentioned.

The facility is considered to be in compliance.

NAME B. Zantoff

DATE 2/22/23

SUPERVISOR C. Hare