

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N723623932

FACILITY: Conveyor Systems Inc.		SRN / ID: N7236
LOCATION: 167 N. Industrial Hwy., ALPENA		DISTRICT: Gaylord
CITY: ALPENA		COUNTY: ALPENA
CONTACT: Pat Eagling , Environmental		ACTIVITY DATE: 11/18/2013
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Fiscal Year 2014 Scheduled Inspection		
RESOLVED COMPLAINTS:		

2014 FY.

Conveyor Systems, Inc. in Alpena County constructs conveyors. The facility has PTI 145-03 which permits the wet paint spray booth used for painting structural steel used in the manufacturing of conveyors. The facility is a *optimal* ^{true minor for} source for HAPs and VOCs. PTI 145-03 EUBOOTH limits VOCs to 15 tons per 12-month rolling time period, and FG FACILITY limits each individual HAP to less than 9.0 tpy, and Aggregate HAPs to less than 22.5 tpy.

On November 18, 2013 Mr. Pat Eagling of Conveyor Systems, Inc. met Gloria Torello of AQD at the facility for this unannounced site inspection. Torello provided a copy of the inspection brochure. Pat and Gloria reviewed the conditions of permit 145-03, and contacted Leslie Davis of Conveyor Systems, Inc. via telephone to let her know Torello was on site and Torello would request records from Leslie. Pat and Gloria then inspected the facility.

The permitted paint booth was not in operation the day of the inspection. Pat said the permitted spray booth is rarely used. Five of the filters in the permitted spray booth, each filter measuring approximately 12 inches square, were observed on the floor. Torello reminded Pat the filters need to be in proper working order before using the spray booth.

Most of the metal parts are coated using the dry Powder Coating booth. The Powder Coater was installed in approximately 2003. The Powder Coater vents internally. The Powder Coater uses natural gas fired ovens. The ovens vent to atmosphere. The ovens heat to approximately 400 degrees Fahrenheit-which is the temperature the powder "melts" and coats the metal. The Powder Coater was installed under exemption, see Rule 287(d).

The parts washer uses water and iron phosphate.

Torello observed three stacks found on the north side of the roof of the facility. No visible emissions were present.

EU-BOOTH

Special Condition (SC) 1.1. PTI 145-03 EUBOOTH limits VOCs to 15 tons per 12-month rolling time period. The September 2013 records show VOC emissions were 0.18 ton in September, and the 12-month rolling VOC emissions were 2.61 tons.

SC 1.2 & 1.3. The waste coatings, clean-up solvents, and used filters are stored in closed containers on site. The containers are 55 gallon drums with labels including: Non-Hazardous (dust off floor and filters), Oil Base Drum & Thinning, Water Base, and Water Waste Only. Approximately every six months 2 or 3 barrels are removed from the site.

SC 1.4. Torello reminded Pat the filter needs to be in proper working order before using the spray booth including all exhaust filters are installed, maintained and operating in a satisfactory manner.

SC 1.5. The VOC content, water content and density of coating as applied and received is determined using Method 24.

SC. 1.6. Records were available upon request and in a timely manner.

SC 1.7. Per conversation with Leslie Davis, the permittee maintains a listing from the manufacturer of the chemical composition of each coating, it is a long list and includes the MSDS sheets. Leslie said MSDS sheets will soon be update to a new name and format.

SC 1.8 Records are made of:

1. Gallons of coatings used,
2. VOC content of coatings,
3. VOC mass emissions calculations determining monthly emission rates per month,
4. VOC mass emission calculations determining monthly emission rates per 12-month rolling time period.

SC 1.9. The permittee keeps the information for purge and clean up solvents:

- Gallons of each solvent used and reclaimed each month,
- VOC Content in pound per gallon of solvents used
- VOC mass emissions per month in tons
- VOC mass emissions per 12-month rolling time period.

FG FACILITY

SC 2.1 a & b. The condition limits FGFACILITY to less than 9.0 tpy of each individual HAP, and to less than 22.5 tpy aggregate HAPs. The September 2013 records show: individual HAPs emissions were 0.03 ton and the Aggregate HAPs were 0.53 ton for the 12-month rolling time period.

Please note, the monthly records include the text "12 month rolling average tons individual HAPs, and 12 month rolling average limit. On 12/19/13 Torello called Leslie Davis and discussed the word *average*. The permittee interprets *average* to mean a given month plus the previous 11 months (which is a 12 month rolling time period).

With this explanation Torello does not object to the word *average*. Leslie said she would update the record keeping form.

SC 2.2. The HAP content of any coating or material is determined using the manufacturers' formulation data.

SC 2.3. Records were available upon request and in a timely manner.

SC 2.4. The permittee keeps the required records.

NAME Gloria Torello DATE 12-19-13 SUPERVISOR 