

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

N742631937

FACILITY: CROWN GROUP SHELBY TWP PLANT		SRN / ID: N7426
LOCATION: 12020 SHELBY TECH DR, SHELBY TWP		DISTRICT: Southeast Michigan
CITY: SHELBY TWP		COUNTY: MACOMB
CONTACT: STEVEN MARTIN , FACILITIES MANAGER		ACTIVITY DATE: 10/16/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On October 16, 2015, I conducted a level 2 unannounced target inspection at The Crown Group Company - Shelby Plant located at 12020 Shelby Tech Drive, Shelby Township, Michigan 48315. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the administrative rules. During the inspection, I was accompanied by Mr. Steven Martin, Facilities Manager. At the pre-inspection conference, I showed my ID Badge, stated the purpose of my visit, and gave a copy of the pamphlet, "Environmental Inspections: Rights and Responsibilities", to Mr. Jason Planck, Plant General Manager, and Mr. Martin. Mr. Planck and Mr. Martin accompanied me during the walk through inspection.

The facility coats miscellaneous metal parts using e-coat system and powder coating process. During the inspection, I observed the facility coating metal rack parts from the next door company, JAC Products, and other miscellaneous automotive parts from various customers. Metal parts to be coated go through an 11 stage cleaning process that starts with Stages 1 & 2 metal parts cleaning using soapy water cleaner sprays at 125°F (124°F during inspection). Stage 3 is hot water cleaning through immersion at around 130°F (129°F during inspection). Stages 4 & 5 are city water rinsing processes. Stage 6 is alkaline cleaning/conditioning. Stage 7 is Zinc phosphating process and observed to be operating at 112°F. Stages 8 & 9 are city water rinsing processes. Stage 10 is a sealing process. Stage 11 is RO (reverse osmosis) water immersion rinse process. After the 11- stage cleaning process, the parts go through electrodeposition coating (e-coat) process and 3 stages of post rinsing. The e-coat process utilizes a very low VOC water based coating. The coated parts go through a curing oven followed by 7 stages of powder coating process and another curing oven. The curing ovens operate around 370°F to 385°F. From the curing oven, the parts go through final inspection and packing for shipment to customers.

The facility does not have any permit to install for the processes above. An AQD letter dated February 14, 2001 determined that the powder coating process was exempt under AQD Rule 287(d) and the e-coat process was exempt under AQD Rule 290. The Safety Data Sheets I obtained for the e-coat paint showed no

Hazardous Air Pollutant compounds and I did not find IRSL values for Carbon Black, Kaolin, and Dibutyltin Oxide. It appeared that the monthly VOC limit for the e-coat paint is 1,000 lb. and AQD Rule 290 requires monthly recordkeeping to show compliance with the VOC emission limit. Per Rule 290 applicable requirement, the facility keeps monthly records of coating usage in gallons and the calculated VOC emissions. During inspection, I obtained monthly records from FY 2013 through August 2015. The records showed the calculated monthly VOC emissions were less than 1000 pounds per month. The total tons of VOC emitted were 2.42 tons for FY 2013, 2.85 tons for FY 2014, and 1.75 tons January through August 2015.

Overall, I did not find any noncompliance issues during the inspection.

NAME FMH

DATE 11/10/2015 SUPERVISOR CJE