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FY2018 Insp

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

P041643031

FACILITY: METAL-TECH SYSTEMS INC.		SRN / ID: P0416
LOCATION: 3077 OLD FARM LANE, COMMERCE TWP		DISTRICT: Southeast Michigan
CITY: COMMERCE TWP		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 11/20/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2018 inspection of Metal-Tech Systems, Inc.		
RESOLVED COMPLAINTS:		

**Metal-Tech Systems, Inc. (P0416, aka MCDS Misc-1422)**  
**3077 Old Farm Lane**  
**Plant: Walled Lake**  
**P.O. Commerce Twp., Michigan 48390-1639**

**Rule 287(2)(c) booth**

**VN: AQD issued Violation Notice dated January 24, 2013, for operating the paint spray booth with a couple of filter panels removed (Rules 201 & 910).**

On November 20, 2017, I conducted a level 2 self-initiated **FY 2018 inspection** of Metal-Tech Systems, Inc. ("Metal-Tech" or "M-tech" or "MTS" or "the company") located at 3077 Old Farm Lane, Plant: Walled Lake, P.O.: Commerce Twp., Michigan 48390-1639. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources; and Environmental Protection Act, 1994 PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

During the inspection, Mr. Robert Thompson (Phone: 248-960-8160; Cell: NA; Fax: 248-960-9825; E-mail: [rThomson@mtsGlobal.com](mailto:rThomson@mtsGlobal.com)), assisted me.

Mr. Chris Masters (Phone: 248-960-8160; Cell: 248-318-6755; Fax: 248-960-9825; E-mail: [CMasters@mtsGlobal.com](mailto:CMasters@mtsGlobal.com)), separated about October 2016.

Metal-Tech Systems, Inc. (M-tech or MTS) is special machine builder for automotive industry. M-tech does not use any solvent degreaser. Painting is done to paint the metal boxes that house the machines. Steel is received, cut and holes are drilled. There is a small welding machine with no exhaust to outside ambient air.

**One 287(2)(c) paint spray booth**

M-tech has one 8 ft. W x 8 ft. D \* 8 ft. H (open at front) topcoat paint spray with a back-draft dry filter system. The filtered air from the booth is exhausted to outside air via a vertical discharge stack (about 20-foot tall stack) with a no-energy-loss rain protection. Alkyd industrial enamel paints are used. Diluent solvents are used to adjust viscosity. Approximately, < 5 (<<200) gallons per month of paint is used. HVLP guns are used; sometimes, spray cans are used as well. 1-gallon pail paint is purchased.

AQD issued Violation Notice dated January 24, 2013, for operating the paint spray booth with a couple of filter panels removed (Rules 201 & 910). It appeared that the filters were removed

intentionally when air flow reduced as result of increased pressure drop ( $\Delta P$ ) due to paint cake build up on the filters. Instead, the filters should have been replaced. Repeat inspection of May 29, 2013, confirmed that the booth was repaired and all 16 filter panels were installed properly. I asked Mr. Thompson to send a written response to the violation notice. I informed Mr. Thompson that overspray paint particles could cause property damage (e.g. cars, trucks, etc.) if the filter system was not operated properly.

I asked Mr. Thompson to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. Tapes (painters, duct, etc.) may be used to cover gaps. I also asked him to keep records of paint and solvent usage according to Rule 336.287(2)(c).

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(c).

Upon keeping paint and solvent usage records (< 5 gallon per month based upon estimates counting number of pails << 200 gallons per month) and installing and operating the filter system properly, the coating booth meets all of the Rule 336.1287(2)(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

AQD will conduct a follow inspection to ensure continued compliance with proper operation of the booth (Rule 287(2)(c)).

### Conclusion

M-Tech is in compliance with Rule 287(2)(c) and the filters were installed properly.

NAME J. K. Hanaholt

DATE 01/16/2018

SUPERVISOR Joyce