

Genesee, general

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

U25180535745288

FACILITY: Multiblast Environmentally Safe Stripping Inc		SRN / ID: U251805357
LOCATION: 11323 Vienna Rd., Montrose		DISTRICT: Lansing
CITY: Montrose		COUNTY: GENESEE
CONTACT: Jeff Triggs, Manager		ACTIVITY DATE: 07/24/2018
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <i>MINOR</i>
SUBJECT: Unannounced, self-initiated inspection.		
RESOLVED COMPLAINTS:		

On 7/24/2018, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced, self-initiated inspection of Multiblast Environmentally Safe paint Stripping (Multi-Blast), a small business which AQD has never inspected before. The purpose was to ensure compliance with the Michigan Air Pollution Control Rules, and to investigate possible sources of air pollution regarding a recent series of odor and fallout complaints in the vicinity of Montrose, Michigan.

**Environmental contact:**

Jeff Triggs, Manager; 810-639-6244, [madeinamericaclothing@yahoo.com](mailto:madeinamericaclothing@yahoo.com)

**Facility description:**

Multi-Blast performs shot blasting on vehicles undergoing restoration, and applies a primer coating to them. The vehicles go offsite to receive color coats or clear coats.

**Emission units:**

Shot blast booth exhausting to the indoor plant environment, after passing through a control system: Rule 285(l)(vi)(B); Compliance.

Surface coating booth for applying primer; rebuilt in 2011; Rule 287c); Compliance.

**Regulatory overview:**

This facility is considered a *minor source of criteria pollutants*, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A *major source* of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants, and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or *area source* for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

Michigan Air Pollution Control Rule 201 requires a permit to install, unless there is a relevant exemptions. The exemption appropriate for a shotblaster installed prior to 12/20/2016's revision to the exemptions is Rule 285(l)(vi)(B), which exempts the following:

- (vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following:
- (B) Equipment has emissions that are released only into the general in-plant environment.

The exemption appropriate for a surface coating line installed prior to the 12/20/2016 revisions to the

**exemption rules is Rule 287(c), which exempts the following:**

(c) A surface coating line if all of the following conditions are met:

- (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
- (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
- (iii) 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.

**There does not appear to be a boiler onsite. It is typical for industrial facilities to have hot water heaters onsite for restrooms, however. To meet the definition of a hot water heater under 40 CFR Part 63, Subpart JJJJJJ, *National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional boilers Area Sources*, the unit must be no more than 120 gallons in capacity. A hot water heater <120 gallons in size would not be subject, under Section 63.11195(f). A facility of this size would generally not be expected to have a hot water heater that would be larger than this.**

**40 CFR Part 63, Subpart HHHHHH, *National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is a federal rule that was proposed in the Federal Register on September 17, 2007, and the final Rule was promulgated on January 9, 2008. The rule regulates three activities:**

1. Paint stripping using methylene chloride: not applicable to Multiblast, as they use a shotblaster.
2. Surface coating of motor vehicles and mobile equipment: potentially applicable to Multiblast.
3. Surface coating of miscellaneous metal and plastic parts: potentially less likely to be applicable to Multiblast.

**There is an option for owners or operators of motor vehicle or mobile equipment spray coating operations to petition the U.S. EPA for an exemption from HHHHHH, also known as 6H, if they can demonstrate that they don't spray apply coatings that contain the following targeted HAPs: chromium, lead, manganese, nickel and cadmium. The demonstration must include a description of the coatings that they apply and certifications that they do not spray any coatings containing the targeted HAPs. A Petition for Exemption form is located on the DEQ Web site, along with other outreach tools. I will provide guidance documents to the company to help them determine if they are subject to 6H. They may also choose to contact the DEQ's Environmental Assistance Program at (800) 662-9278, for assistance.**

**Fee status:**

**This facility is not considered a Category I fee-subject facility, because it is not a major source of criteria air pollutants. It is not considered a category II fee-subject source because it is neither a major source for hazardous air pollutants, nor is it subject to a federal New Source Performance Standard regulation. Lastly, it is not considered a Category III fee-subject facility, because it is not subject to a federal Maximum Achievable Control Technology standard.**

**Location:**

**The facility is just west of the downtown area of Montrose, and is on the south side of M-57, also known as Vienna Road. It is immediately east of a larger industrial facility. To the north is a small business, to the east are residences, and to the south are wooded areas.**

**Arrival:**

**I arrived at 2:00 PM. I provided my identification/credentials to an employee who met with me. He explained the facility manager had just left the site, but would be back in a few minutes. I soon met with the manager, Mr. Jeff Triggs.**

**I explained that I was following up on recent complaints of industrial air pollution in the area, which had been attributed to a neighboring industrial facility. I explained that in order to do a thorough**

investigation and to be fair, I was trying to inspect other potential sources of air emissions in the vicinity. Mr. Triggs accompanied me around the facility, during the inspection.

**Inspection:**

**Shotblaster; Rule 285(l)(vi)(B):**

The shot blaster was not operating at this time. It is inside the shop building, and exhausts to a pulse jet baghouse located outside the building, which returns the cleaned air to the shop interior. This unit appears to satisfy the exemption criteria, and does not require an air use permit, also known as a permit to install. The shot blaster appeared to be in good condition.

**Coating line; Rule 287(c):**

The coating line, or paint booth, was not operating at this time, although there was a faint smell of paint inside the shop. I was informed that this is a cross draft paint booth, with 2 panel filters of a rolled material on each side, and explosion-proof lights. Incoming air is also filtered, I was shown.

I explained that to qualify for the Rule 287(c) exemption, the facility will need to keep coating use records on a monthly basis, to demonstrate that they are below the 200 gallons per month of coatings which their exemption allows. Mr. Triggs indicated that they never even reach 4 gallons of coatings use per month, and typically use 2 or 2.5 gallons per month. He agreed to keep coating use records, and explained that they have been keeping their coating purchase records onsite

I was advised that the main coating they use is a high solids epoxy primer, specifically intended for priming bare metal which has been blasted.

I inquired as to parts washing, and was told they no longer use a solvent-based parts cleaning system. If they want to clean a part, they typically just use the shotblaster.

**Conclusion:**

No instances of noncompliance were found. The facility does not appear to be a contributor to recent air pollution complaints in the area. I left the site at 2:42 PM.

Note: AQD will mail to the company guidance information on Subpart 6H, so that they can determine if they are subject to that federal regulation AQD and the Environmental Assistance Center can provide guidance with this complex regulation, as needed.

NAME



DATE

9/30/2018

SUPERVISOR

