

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

U41180581445383

FACILITY: ABC Coating Company, Inc.		SRN / ID: U411805814
LOCATION: P.O. Box 9484 1503 Burlingame S.W., Wyoming		DISTRICT: Grand Rapids
CITY: Wyoming		COUNTY: KENT
CONTACT: Carrie Sayers, Vice President		ACTIVITY DATE: 07/31/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self initiated inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 1:23 pm on July 31, 2018 to complete a self-initiated inspection. The weather conditions were partly cloudy, winds from the east at 5-10mph and high 70's°F.

Facility Description

ABC Coating Company, Inc. (ABC) is an epoxy rebar coating facility with offices located in several states with consumers including the Michigan Department of Transportation. The company does not operate with an air use permit to install; but instead utilizes exemptions for all on site processes.

Compliance Evaluation

Prior to entering the facility, offsite visible emissions and odor observations were completed. No emissions or odors were noted. Upon entering the facility, AQD staff AS met with Ms. Carrie Sayers, Vice President. The purpose of this inspection was stated to Ms. Sayers. Following the initial discussion, a tour of the facility was completed as well as a wrap up discussion at the end. During the inspection, Ms. Carrie answered all site specific questions and provided requested applicable records.

Observations

Listed below were the observations made during the inspection.

- Rebar is shipped in bundles on site via truck where it will go through various processes before being shipped to the consumer. It was noted during the inspection that epoxy coated rebar is called green bar, and black bar is non-coated rebar.
- Cutting machines were observed during the inspection for cutting rebar to the appropriate consumer desired length. ABC believes that the cutting machines are exempt from permitting per Rule 285(2)(l)(vi) (B). This exemption appears to be applicable.
- Wheel house machines were observed during the inspection where the rebar is shot blasted and cleaned. The metal particulate from the shot blasting is captured by dust collectors and then must pass through filters before being vented internally. Particulate collected from the dust collectors is collected in 55-gallon drums and shipped offsite to be recycled. During the inspection, it was recommended that ABC staff eliminate the open space between the dust collector spout and 55-gallon container to reduce fugitive emissions. ABC staff believe the wheel house machines are exempt from permitting per Rule 285(2)(l)(vi) (B). This exemption appears to be applicable.
- During the inspection, 55-gallon containers full of collected particulate were observed not being properly sealed to reduce fugitive emissions. Additionally, particulate was observed on the ground in the area outside where the 55-gallon containers are stored before being shipped off site. The particulate on the ground appeared to be limited to a small area. Properly sealing the 55-gallon containers to eliminate generation of fugitive dust as well as cleaning up the particulate in the observed area was recommended.
- Once the rebar is cleaned it is then heated and epoxy powder coated. The powder coating booths were equipped with automatic spray nozzles and spent material was recirculated back and reused. Emissions from the powder coating booths were filtered and vented internally. Cartridge filters are changed as needed for the filters. ABC believes that the powder coating operations are exempt from permitting per Rule 287(2)(d). This exemption appears to be applicable.
- Following the powder coating operations, the rebar is cooled via water systems.
- A manual touch up paint area was observed during the inspection. Purchase records since 2017 were requested and reviewed. All material purchased is used. For 2017 approximately 165 gallons were purchased and so far in 2018 110 gallons have been purchased. Based on the purchase records, it

appears that ABC is well within 200 gallons per month and the touch up area appears to be exempt per Rule 287(2)(c).

Conclusion

A final discussion was held between AQD staff AS and Ms. Sayers. Based on the facility walkthrough and observations made, ABC appears to be in compliance with applicable air quality rules and regulations at this time.

NAME Adam E. Schaffner

DATE 08/03/18

SUPERVISOR AS