

M4825
MANILADEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

M482563825

FACILITY: DEARBORN MID-WEST COMPANY		SRN / ID: M4825
LOCATION: 20336 SUPERIOR RD, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Larry Cosme , Quality Control / Facility Manager		ACTIVITY DATE: 07/27/2022
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 7/27/2022

TIME OF INSPECTION : 10:00 am

EPA POLLUTANT CLASS : VOC

INSPECTED BY : Jill Zimmerman, AQD

PERSONNEL PRESENT : Larry Cosme, Quality Control / Facility Manager

LarryC@dmwcc.com

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FACILITY BACKGROUND

Dearborn Midwest Conveyor (DMW) manufactures conveyors for the auto industry. Most of the facility is a machine shop, welding area or storage with one paint spray booth. DMW is located in Taylor on Superior Road and is bordered by Northline Road to the north, Allen Road to the east, Eureka Road to the south and Rancho Road to the west. The facility is considered a synthetic minor source for volatile organic chemicals (VOCs) and hazardous air pollution (HAPs) emissions and operates with an opt-out permit. The facility operates one shift per day, five days per week.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. No Violation Notices (VN) have been issued regarding this facility.

PROCESS EQUIPMENT AND CONTROLS

The facility operates a welding and machine shop area, with individual welding areas. Each welding area vents directly into a hood, with the exhaust from each station collected and combined before it passes into the baghouse. The welding equipment and baghouse are exempt under R336.1285 (i).

A paint booth, permitted under Permit 21-00, operates in the workshop area on an as needed basis. The paint gun lines are purged with air unless there is a color change when they are purged with acetone. The filters are changed as needed, and a monitor unit is located on the side of the paint booth to determine when the filters should be changed. Used filters are stored on site sealed until they are landfilled off site. All paints were stored in closed five-gallon containers during the inspection. All paints are water-based paint. Waste paint is stored in labeled, closed 55-gallon drums. When the drums are full, the facility has them shipped off site through a disposal company. There is no cure oven associated with the paint line; all parts dry in the ambient air.

Typically, the customer orders are custom made based on the customer's specification. The conveyor systems are made at this facility. If the lines need to be heat treated, the metal pieces are sent off site. The pieces are painted and allowed to air dry. There is no cure oven at this location for any painted projects.

INSPECTION NARRATIVE

I arrived at the facility at 10:00 am on 07/27/2022 and met with Mr. Larry Cosme to discuss the process, and any changes that have been made to the facility. No changes to the process have been made to the facility since my last visit.

We toured the plant floor, and physically inspected the equipment. No painting was occurring during the inspection. Filters were present inside the booth on the walls and the floor. Because the wall filters are on rolls, extra filters can be rolled at any time. The booth vents directly to three stacks located on the north side of the building. These stacks have not been modified since they were installed. The facility's waste consists of used oil, empty paint buckets, used paint filters and other miscellaneous waste. Outside the facility, a shelter is used to store dumpsters, which each store a separate type of waste.

APPLICABLE RULES/PERMIT CONDITIONS

The welding operations are exempt under Rule 285 (i).

The paint booth is permitted under permit 21-00, and the special conditions are as follows:

1. NA – No notification is required to operate this facility.
2. Unknown – Records were requested on August 12, 2022 but have not yet been received. MAERS for reporting year 2021 has not been received. The most recent MAERS was for reporting year 2020 and reported that less than 2 tons of VOC was emitted during that year, which is below the 15 TPY limit.
3. Compliance – Facility does not use any paints with VOC content greater than 3.5 pounds per gallon (minus water). All MSDS for all coatings are kept in a binder at the facility.
4. Unknown – Records were requested on August 12, 2022 but have not yet been received. MAERS for the reporting year 2021 has not been received. The most recent MAERS was for

reporting year is 2020 and reported less than 2 tons of VOC. Therefore, it can be assumed that the maximum emitted HAPS were be equal to the reported VOC emissions, which is less than the permit limit of 22.0 tons total HAPs, and 9.0 tons individual HAPs.

5. Unknown – Records were requested on August 12, 2022, with a two-week deadline given. Mr. Cosme responded to my email stated that he would get the records to me within the deadline. However, to date, I have not received the records.
6. Compliance – Filters were present during the inspections and appeared to be in good working condition. Replacement filters were also present at the facility.
7. Compliance – Waste containers were stored in a separate area and were in closed containers.
8. Compliance – MSDS for each coating were present at the facility.
9. Compliance – All stacks meet height and diameter requirements, and have not been changed or modified since installation.

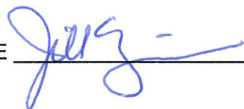
MAERS REPORT REVIEW

The MAERS for reporting year 2021 has not been received. The deadline for this report was March 15, 2022. During the onsite inspection, Mr. Cosme explained that his job responsibilities had increased and he had not had time to complete this report, but that he was working to submit it.

FINAL COMPLIANCE DETERMINATION

Dearborn Midwest Conveyor does not appear to be operating in compliance in with state regulations. To date, the MAERS has not yet been received for reporting year 2021. I was unable to determine compliance with many permit conditions because the requested records have not been received.

NAME



DATE

7/11/2024

SUPERVISOR

