

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

N008174730

FACILITY: Paint Work Inc		SRN / ID: N0081
LOCATION: 2088 Riggs Ave, WARREN		DISTRICT: Warren
CITY: WARREN		COUNTY: MACOMB
CONTACT: Elisabeth Weld-Haddow , President		ACTIVITY DATE: 10/16/2024
STAFF: Mark Dziadosz	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 25 Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, October 16, 2024, I, Michigan Department of Environment Great Lakes and Energy-Air Quality Division staff Mark Dziadosz, conducted an announced inspection of Paint Work Inc. (N0081), located at 2088 Riggs Rd., Warren, Michigan. The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan Department of Environment, Great Lakes and Energy (EGLE-AQD) Administrative Rules, Permit to Install (PTI) No.124-01, and 40 CFR Part 63 Subpart T (Halogenated Solvent Cleaner NESHAP).

Paint Work Inc. conducts miscellaneous metal (mainly steel and aluminum) coatings primarily for military contracts. Operating hours are between 7:00am and 3:30pm, Monday through Friday. Paint Work, Inc. currently has 6 employees. A records request was made on 10/8/24. During the inspection, 2024 and 2021 emission records were provided as well as SDS sheets for the most used coatings. 2020 and 2022-2023 emission records were not received and were obtained from the MiEnviro SLEIS system.

Paint Work Inc. has two manual spray coating lines (EU_Line-01 & EU_Line-02) which include a total of three paint booths, a series of four metal surface prep tanks, and a halogenated solvent vapor degreaser tank. EU_Line-02 is not currently operating; and according to Elisabeth, has not operated for over 10 years.

The coating lines are permitted under PTI No. 124-01 which contains enforceable restrictions on volatile organic compound (VOC) and Hazardous Air Pollutant (HAP) emissions to opt the facility out of the Title V Renewable Operating Permit (ROP) program. The degreaser tank is subject to 40 CFR 63 Subpart T, the Halogenated Solvent Cleaning NESHAP, due to the use of Trichloroethylene (TCE) as solvent.

EU_Line-01 and EU_Line-02

EU_Line-01 includes parts that are painted in "Booth 1" (which is actually 2 booths side by side) and the conveyor line that goes through heat lamps as part of the drying process.

EU_Line-02 (“Booth 3”) is located in an adjacent section of the building. Previously, this booth was used to manually paint larger parts which were then transferred into a natural gas fired oven for drying. The oven has been removed and according to Elisabeth, Booth 3 has been unused for over 10 years; and the room is currently used as storage.

During my inspection, Mr. Mark Shamblin, Vice President, showed me the permitted equipment. Mr. Shamblin showed me EU_Line_01 where they manually apply the coating to the metal parts and the drying oven (heating lamps). The coating line had dry filters installed properly. Mr. Shamblin said that filters are replaced once per day; and Mr. Shamblin was able to show me new, unused filters. The drying oven does not use any fuel, it heats via electricity/lamps and does not vent to the outside ambient air. Mark showed me the vapor degreaser that uses TCE as a cleaning solvent. The lid was closed, and the unit was not in use.

Facility Inspection PTI No. 124-01

VOC emission records were provided via excel sheet. Data reviewed was from 12/1/19 to 9/30/24. The file can be found in S:\Air Quality Division\STAFF\Mark Dziadosz\N0081 Paint Work FY24 Inspection. All VOC data is being referenced from this document unless otherwise stated.

EU_Line-01

- 1. VOC emission limit of 2000 pounds per month. The permittee has not exceeded this limit in any of the months reviewed. The highest total in the time period reviewed was 849.7 lbs for October 2019.**
- 2. VOC emission limit of 10 tons per 12-month rolling time period. The permittee has not exceeded this limit. The highest total in the time period reviewed was 3.77 tons from 1/1/19-12/31/19.**
- 3. The permittee shall keep records of the following information on a monthly basis:**
 - a. Gallons of each material (coatings, reducers, cleaners, etc.) used. Usage of each VOC containing material was provided.**
 - b. VOC content of each material used. VOC content of each material used was provided.**
 - c. Monthly VOC emission totals. Monthly VOC calculations were provided.**
 - d. 12-month rolling time period VOC emission totals. 12-month VOC total calculations were provided.**

4. The permittee shall keep records of the following information on a calendar monthly basis for the use of clean-up and purge solvents associated with EU_Line-01:

- a. Gallons of each solvent used and reclaimed. (coatings, reducers, cleaners, etc.) used. Usage of each VOC containing material was provided.**
- b. VOC content (lb/gal) of each solvent used. VOC content of each solvent used was provided.**
- c. Monthly VOC emission totals. Monthly VOC calculations including solvents were provided.**
- d. 12-month rolling time period VOC emission totals. 12-month VOC total calculations were provided.**

5. The exhaust stacks of EU_Line-01 discharge unobstructed vertically to the outside ambient air. Dimensions were not verified.

EU_Line-02

This emission unit has not been operated for approximately 10 years. Paint Work, Inc. has not ruled out using it in the future, but currently is not operating the paint line and the drying oven has been removed.

The exhaust stack for the coating line is unobstructed. Dimensions were not verified. The exhaust stack for the drying oven has been removed.

FG_Lines

11. A VOC emission limit of 126.7 pounds per day. In the time period reviewed, the permittee did not exceed the limit. Most days are in the range of 20-40 pounds per day. The highest observed daily VOC emissions was 71.4 lbs on 2/28/22.

12-14. The permittee properly recovers and disposes of all waste coatings, solvents and spent filters.

15. The permittee shall not operate the booth portions of the FG_Lines unless all respective exhaust filters are installed and operating properly. The filters in EU_Line-01 appeared to be properly installed, all filters are replaced daily.

16. The permittee shall equip the booths with HVLP applicators. The facility only uses HVLP applicators.

17. The permittee received approval from the AQD to use manufacturer's formulation instead of Method 24 testing.

18. The permittee keeps and showed me the SDS for all materials currently being used at the facility.

19. The permittee shall keep the following information on a calendar day basis for the FG_Lines:

- a. Gallons (with water) of each material used. Usage of each material was provided.**
- b. VOC content of each material used. VOC content of each material used was provided.**
- c. Daily VOC emission rate calculations in pounds per day. Calculations were provided.**

FG_SS (Stationary Source)

20. Individual HAP emission limit of 9.0 tons per 12-month rolling time period. The highest observed individual HAPs used was TCE at 3.08 tons from February 2020 through January 2021.

21. Aggregate HAPs emission limit of 22.5 tons per 12-month rolling time period. The highest observed aggregate HAPs used was 4.03 tons from February 2020 through January 2021.

22. The permittee uses manufacturer data to determine the HAP content of each material used with AQD approval.

23. The permittee was able to present SDSs for all materials used at the facility.

24. The permittee has been keeping monthly records of the following:

- a. Gallons (with water) of each material used. Usage of each material was provided.**
- b. HAP content of each material used. HAP content of each material used was provided.**
- c. Daily HAP emission rate calculations in pounds per month. Calculations were provided.**

40 CFR Part 63 Subpart T, Halogenated Solvent Cleaning NESHAP

For the degreaser, Mr. Shamblin stated that he conducts daily inspections on the cover, the seals, and other mechanical parts for potential leaks and to make sure employees are using the degreaser properly and keeping the cover closed. During the inspection, the degreaser appeared to be operating properly and appeared to have the correct freeboard ratio (greater than 0.75).

Conclusion

Based on the information gathered during the inspection, Paint Work, Inc. appears to be in compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, PTI No. 124-01, and 40 CFR Part 63 Subpart T, Halogenated Solvent Cleaning NESHAP.

NAME 

DATE 11-25-2024

SUPERVISOR 