# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

### **ACTIVITY REPORT: Scheduled Inspection**

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DISTRICT: Upper Peninsula COUNTY: MENOMINEE
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ACTIVITY DATE: 08/31/2018
SOURCE CLASS: MINOR
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On 8/31/2018, I conducted an unannounced inspection of this facility. My contact was Mr. Michael Shaffer, Materials Manager.

This facility is a paint coating wholesale distributer that blends and mixes pigments and solvents and sells the products to retailers. The initial permit, PTI#866-92, was issued in 1992 and modified in 1993 and 1996. The permit regulates VOC and PM emissions.

#### **Rule 702**

SC13 states the VOC emission rate from the blending and compounding equipment is limited to 11.1 lbs/hr and shall not exceed 20 TPY based on a 12-month rolling average. SC17 limits solvent usage to 2 million lbs/yr.

Permit evaluation from 2/29/1996 results show the facility is a relatively small source of VOCs. No controls exist for fugitive VOC emissions; there is a closed-covered system which satisfies the requirements of Rule 702.

Since the original permit was issued, water-based products account for an increasing amount of their sales. Because of this, the potential for fugitive VOC emissions have reduced significantly since the original permit was issued and since the 1996 permit evaluation.

Solvent usage from 9/01/2017 to 8/31/2018 was 549,887 lbs. This is well below the permitted limit of 2 million lbs/yr.

#### Particulate Matter

SC14 limits particulate emissions to 0.1 lbs per 1000lbs of exhaust gases, calculated on a dry gas basis, nor 0.86 lbs/hr. SC17 limits pigment usage to 1.5 million lbs/yr.

Pigment usage from 9/01/2017 to 8/31/2018 was 296,551lbs. This is well below the permitted limit of 1.5 million lbs/yr.

SC18 requires the baghouses to be installed and operating properly. SC19 requires the facility install and maintain a pressure drop indicator.

The facility has three baghouses that are used to collect fugitive dust from various paint handling operations. The pigment weigh-out baghouse was observed to be operating with a differential pressure of 6" of H2O. A fiberglass pre-filter is used as the fines from this operation clog the bags quickly. The north baghouse was observed operating with a differential pressure of 4.4" H2O. The south baghouse was operating at 5.85" H2O.

Records indicate that bags in the main baghouse were changed 8/21/2017. Mr. Shaffer stated that they seem to get about 4 years out of a set of bags. Bags in the smaller 3rd floor collector were changed on 3/05/2018. No bag 'blowouts' had occurred at any time. No visible emissions were observed from any of the baghouses.

## Waste Disposal

SC20 requires the facility to dispose of wastes in a manner which minimizes the introduction of air contaminants to the outer air.

All paint waste and baghouse fines are no longer recycled, they are disposed of as solid waste.

## Conclusion

No violations of the Air Pollution Control Rules were observed during this inspection and the facility is in compliance with PTI #866-92 (revised 1996).

NAME

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SUPERVISOR\_