

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

P098274209

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| FACILITY: Central Conveyor | | SRN / ID: P0982 |
| LOCATION: 52800 Pontiac Trail, WIXOM | | DISTRICT: Warren |
| CITY: WIXOM | | COUNTY: OAKLAND |
| CONTACT: Mike Fagan , Director of Operations | | ACTIVITY DATE: 10/15/2024 |
| STAFF: Owen Pierce | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: FY 25 Compliance Inspection Report | | |
| RESOLVED COMPLAINTS: | | |

On October 15, 2024, I (Owen Pierce EGLE - Air Quality Division) performed a scheduled targeted inspection of Central Conveyor located at 52800 Pontiac Trail, Wixom, Michigan. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and the conditions of Permit-To-Install (PTI) No. 26-19A. Upon arrival, I met with Mike Fagan, Director of Operations, Ryan Wizner, Production Manager, and Patrick McCree, Shop Superintendent, and conducted a pre-inspection meeting where I introduced myself, presented my credentials, and stated the purpose of the inspection.

Central Conveyor, a member of the Tsubaki Group, is a global leader in the automotive and industrial industries, specializing as an integrator of conveyors and material handling systems since 1993. In June 2018, the Tsubaki Group purchased Central Conveyor Systems. According to Mike Fagan, Central Conveyor has approximately 40 employees, including both office and shop employees. Central Conveyor runs 1 shift in the shop from 6:00 am to 2:30 pm, while office employees generally work from 6:00am to 6:00pm, both Monday through Friday. Central Conveyor is permitted to operate 1 Spray booth and is a synthetic minor or "opt-out" source for hazardous air pollutants (HAPs).

According to Mike, there have been no recent process or equipment changes, and there are no boilers, cold cleaners, or emergency generators at the facility. Following the pre-inspection meeting, Ryan and Patrick lead me on an inspection of the facility.

Facility Walk-through Observations

During the facility walk-through, I was lead to the EUPAINTBOOTH where I observed that dry filters were in place and maintained. Ryan explained that EUPAINTBOOTH has a double filter system: a square filter on the front side of the back wall of the spray booth and a cone shaped filter on the back side of the back wall of the spray booth. Ryan pulled back one of the square filters and showed me one of the cone filters that were in place. Ryan explained that the filters are changed once the pressure differential gauge reaches 0.30 " of water column (WC). In addition, Ryan explained that the facility keeps a full set of filters ready to be installed at all times. The spent filters get placed in a 55-gallon drum that is filled up 3/4 of the way with the filters and then the facility adds water to the drum before sealing it. Safety Kleen is the company that disposes of the filters. I also observed that the spray guns in EUPAINTBOOTH were high volume-low pressure applicators.

Next to the EUPAINTBOOTH is the facility's paint mixing and storage room. In the mixing room, all containers with coatings, reducers, solvents, and thinners were properly covered in a manner to minimize the generation of fugitive emissions. In addition, I observed that the paint mixing room is ventilated with dry filters in place for particulate control.

Around the warehouse, I observed many tools used for cutting, grinding, drilling, etc, that are exempt from requiring a PTI according to Rule 336.1285(2)(l)(vi)(B) since emissions from these tools are released into the general in-plant environment.

I also observed a plasma cutting table, equipped with downdraft ventilation where fumes generated from the plasma cutting are captured and emitted externally to the ambient air through a stack. According to the facility, this piece of equipment was also believed to have met the requirements to be PTI exempt. Rule 336.1285(2)(l)(vi)(C) exempts equipment used for the cutting of metals (including plasma cutting) if

the equipment that has externally vented emissions is controlled by an appropriately designed and operated fabric filter collector that, for all specific operations with metal, is preceded by a mechanical precleaner. Upon further review from the facility, I was informed that the capture system for the plasma cutting table is not equipped with filter fabric control, which means that piece of equipment does not meet the Rule 336.1285(2)(l)(vi)(C) exemption, and is in violation of Rule 336.1201. A violation notice will be issued.

During the facility walk-through I did not see any boilers, cold cleaners, or emergency generators.

PTI No. 26-19A Compliance Evaluation

The facility was issued PTI No. 26-19A for one paint spray booth with a filtered air exhaust system and a facility wide HAP opt-out limit. Recordkeeping requirements from September 2023 through September 2024 were submitted to me via email by Mike Fagan. Records can be located internally at the following link: S:\Air Quality Division\STAFF\Owen Pierce\FY 25\Central Conveyor.

EUPAINTBOOTH

SC I.1 through I.2 establishes emission limits for EUPAINTBOOTH. VOCs, tert-butyl acetate (TBA), acetone, and p-chlorobenzotrifluoride (PCBT) emissions combined are limited to 25.0 tpy based on a 12-month rolling time period as determined at the end of each month. VOC emissions are also limited to 3.5 lb/gal (minus water) as applied and determined on a daily volume-weighted average. Compliance with these emission limits is based on SC VI.3 which states that the permittee shall record the gallons of each material used, VOC content in pounds per gallon, and VOC emission calculations determining the daily volume-weighted average VOC content of the coatings used in pounds per gallon, minus water, as applied on a calendar day basis, and SC VI.4 which states that the permittee shall record gallons (with water), content of each material applied, and combined emissions calculations of VOC TBA, acetone, and PCBT. VOC content was determined using the manufacturer's formulation data.

After a review of the records, the highest 12-month rolling combined VOC, TBA, acetone, and PCBT emissions from September 2023 - September 2024 was approximately 2.63 tpy as recorded at the the end of May 2024. According to the records, the highest VOC emission rate on a daily volume-weighted average from September 2023 - September 2024 was 3.22 lb/gal on January 22, 2024.

SC III.1 states that the permittee shall capture all purge/clean-up solvents and waste coatings and shall store them in closed containers. The permittee shall also dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. During the facility walk-through, I observed that all purge/clean-up solvents and waste coatings were stored in closed containers and it was explained to me that the company Safety Kleen disposes of the waste materials in an acceptable manner.

SC III.2 states that the permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. As previously stated, spent filters get placed in a 55-gallon drum that is filled up 3/4 of the way with the filters and then the facility adds water to the drum before sealing it. Safety Kleen is also the company that disposes of the filters.

SC III.3 states that the permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. During the facility walk-through, I observed that all containers with coatings, reducers, solvents, and thinners were properly covered in a manner to minimize the generation of fugitive emissions.

SC IV.1 states that the permittee shall not operate EUPAINTBOOTH unless all respective exhaust filters are installed, maintained, and operated in a satisfactory manner. During the inspection, I observed that the filters were installed, maintained, and operating in a satisfactory manner.

SC IV.2 states that the permittee shall equip and maintain EUPAINTBOOTH with high volume-low pressure (HVLP) spray applicators or comparable technology with equivalent transfer efficiency. HVLP

applicators, the permittee shall keep test caps available for pressure testing. During the inspection I observed that EUPAINTBOOTH was equipped with HVLP spray applicators.

SC V.1 states that the permittee shall determine the VOC content, water content, and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. Mike Fagan confirmed, via email, that the facility currently performs calculations using the manufacturer's formulation data. The facility has not received approval for using manufacturer formulation data in place of Method 24 and is not in compliance with this condition. A violation notice will be issued.

SC VI.2 states that the permittee shall maintain a current listing from the manufacturer of the chemical composition of each material including the weight percent of each component. The facility keeps records of the chemical composition of each material by keeping Material Safety Data Sheets on file.

FGFACILITY

SC I.1 through I.4 establishes source-wide emission limits for the facility. Individual hazardous air pollutants (HAPs) are limited to 8.9 tpy, aggregate HAPs are limited to 22.4 tpy, Ethylbenzene is limited to 8.9 tpy, and Naphthalene is limited to 1.5 tpy, all based on a 12-month rolling time period as determined at the end of each month. Compliance with these emission limits is based on the following:

- SC VI.3 - which states that the permittee shall record the gallons of each HAP containing material used, HAP content in pounds per gallon or pound per pound, and individual and aggregate HAP emission calculations determining the monthly and annual emissions;
- SC VI.4 - which states that the permittee shall record the gallons of Ethylbenzene used, Ethylbenzene content, and monthly and annual emissions of Ethylbenzene;
- SC VI.5 - which states that the permittee shall record the gallons of Naphthalene used, Naphthalene content, and monthly and annual emissions of Naphthalene.

HAP, Ethylbenzene, and Naphthalene content was determined using manufacturer's formulation data.

After a review of the records, the highest 12-month rolling aggregate HAP emissions from September 2023 - September 2024 was approximately 1.53 tpy as recorded at the the end of May 2024. Since the highest aggregate HAP emissions were approximately one-sixth of the individual HAP emissions limit, it was determined that individual HAP emissions would not be evaluated for compliance. According to the records, the highest 12-month rolling Ethylbenzene emissions from September 2023 - September 2024 was 0.045 tpy as determined at the end of September 2023. There were zero emissions reported for Naphthalene from September 2023 - September 2024.

Conclusion

Based on information obtained during the inspection, it has been determined that Central Conveyor is in violation of Rule 336.1201 for their plasma cutting table, and is in violation of EUPAINTBOOTH SC V.1. A violation notice will be issued.

NAME Owen Purce

DATE 11/15/2024

SUPERVISOR K. Kelly