

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

**ACTIVITY REPORT: Scheduled Inspection**

A895325398

FACILITY: KOPACZ INDUSTRIAL PAINTING CO		SRN / ID: A8953
LOCATION: 12225 MERRIMAN RD, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT: Edward Kopacz , President		ACTIVITY DATE: 05/22/2014
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : May 22, 2014  
 TIME OF INSPECTION : 11:00 am  
 LEVEL OF INSPECTION : II  
 NAICS CODE : 332812  
 EPA POLLUTANT CLASS : VOC  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Edward Kopacz  
 FACILITY PHONE NUMBER : 734-427-6740  
 FACILITY FAX NUMBER : 734-427-4630

**FACILITY BACKGROUND**

Kopacz Industrial Painting, Inc is located at 1225 Merriman Road in Livonia, northwest of the Plymouth Road and Merriman Road intersection. The facility is a metal parts painting facility, coating parts mostly for military contracts. The facility uses both solvent based coatings and powder coatings. The powder coated parts are baked in one of two small bake ovens. The parts are cleaned in one of two degreasers before being coated, trichloroethylene (TCE) used as the solvent. The hooks and hangers are cleaned with a pyrolysis oven which operates on natural gas at 800 degree F and has an afterburner operating at 1500 degree F. The facility is operating under Opt-Out permit 63-03 because of the Potential To Emit (PTE) HAPs.

The facility operates 5 days per week, 8:00 am to 4:30 pm. The facility employs 3 people.

**COMPLAINT/COMPLIANCE HISTORY**

No complaints have been received regarding this facility.

**OUTSTANDING VN's**

No VN's have been issued regarding this facility.

**PROCESS EQUIPMENT AND CONTROLS**

The facility operates a liquid coating line and a powder coating line. A diptank was removed from the facility in 2005. The metal parts are cleaned in one of two degreaser units. The hangers used to hold the parts through the process are cleaned in a paint pyrolysis burn off oven with an afterburner. This oven operates at 800 F with the afterburner operating at 1500 F.

The facility operates two manual spray paint booths. A third booth was removed in 2005 and replaced with the powder coating line and two electric cure ovens used to baked the coating onto the parts.

The facility operates two vapor degreasing units which are used to clean the parts before coating them.

**INSPECTION NARRATIVE**

I arrived at the facility and met with Mr. Kopacz, who is the owner and president of the company. Together, we walked through the facility, with Mr. Kopacz explaining the process,

and the history of the facility. No major changes have been made since the facility was last inspected. Operations have decreased since my last inspection. During my onsite inspection, no painting was occurring. Mr. Kopacz said that about 50% of the business liquid paint and about 50% powder coat, with powder coat jobs increasing.

No odors were smelled during the inspection. I did not observe any opacity during the inspection.

#### **APPLICABLE RULES/PERMIT CONDITIONS**

The facility operates under State of Michigan Opt-Out permit 63-03, which was issued for coating line, the degreasers, the cure ovens, and the pyrolysis oven.

Section 1 of this permit for EU-DIPTANK has not been evaluated because this equipment has been removed.

Section 2 of this permit for EU-PAINTBTH#3 has not been evaluated because this equipment has been removed.

For EU-PYROBUTNOFF the following conditions were evaluated:

- 3.1 PM emissions are limited to 0.1 pounds per 1000 pounds exhausted air, corrected to 50% excess air. Appears to be in compliance, though no stack test has been performed. At this time, there is no reason to request a stack test.
- 3.2 No visual emissions should be observed from this oven. During the onsite inspection, no visible were observed, therefore the facility is compliance with this requirement.
- 3.3 The facility is operating in compliance. No coatings contain polyvinyl chloride, Teflon, or other halogenated compounds. Only small amounts of organic materials on the metal parts are processed in this oven.
- 3.4 The oven has been installed properly and the afterburner was operating properly during the onsite inspection. The afterburner operates at 1500 F. The facility is operating in compliance.
- 3.5 A current list of all coatings is kept on site with MSDS for each available for review.

For EU-VAPORDEGR#1

This equipment has not been used during the past year. The facility would like to keep the equipment should there be a need in the future. During the onsite inspection, this equipment did not contain any solvent.

For EU-VAPORDRGR#2

- 5.1 The facility is operating in compliance with 40 CFR 63 Subpart A and T.
- 5.2 The facility is complying with all of the work practice standards required by this permit.
- 5.3 The facility is operating this vapor degreaser in compliance with 40 CFR 63.463.
- 5.4 The control equipment appears to be operating properly. No exceedances have occurred since the last inspection.
- 5.5 PTE calculations were made during the permitting process. No changes have been made to the process that would affect these calculations.
- 5.6 Proper records are maintained for this equipment and are kept on site. These records were reviewed during the onsite inspection.

5.7 All reports are submitted in a timely fashion.

For FG-OVENS

6.1 Emissions reported to MAERS show that the emissions from the ovens are below the permit limit.

6.2 No visible emissions were observed from the ovens during the onsite inspection.

For FG-PAINTBTHS

7.1 Emissions for both paint booths were less than 2000 pounds for 2012, which is less than the monthly permitted limit.

7.2 Proper records are being kept at this facility and were reviewed during the onsite inspection.

7.3 Coating records are kept at the facility and were reviewed during the onsite inspection.

For FG-FACILITY

8.1 Based on collected records, the facility emitted less than 2 tons of VOCs during 2013, which is under the permitted limit of 90.0 tons per year. The facility emitted less than 2 ton of HAPs during 2013, which is less than the permitted limit of 9 tons of individual HAPs or 22.5 tons of aggregate HAPs.

8.2 MSDS are available to be reviewed at the facility to determine the VOC content, water content and density of the coatings.

8.3 MSDS are available to be reviewed at the facility to determine the HAP content of the coatings as received and as applied.

8.4 Records are kept at the facility which demonstrates compliance with VOC and HAP requirements for the facility.

#### MAERS REPORT REVIEW

The MAERS report was submitted on February 16, 2014. I reviewed the MAERS on March 17, 2014. The report appeared to be complete with all emissions reported accurately.

#### FINAL COMPLIANCE DETERMINATION

Kopacz Industrial Painting appears to be operating in compliance with all state and federal regulations as well as all permit conditions. Proper records were being maintained, and the equipment was being maintained properly.

NAME *Joe Zimmerman* DATE 6/6/14 SUPERVISOR *mm*

