

A8953

MANUA

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

A895363620

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: 07/13/2022
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : July 13, 2022  
 TIME OF INSPECTION : 11:20 am  
 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 °F and has an afterburner operating at 1500 °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. The facility employs 3 people.

### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility.

### OUTSTANDING VNs

No VNs 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 bake the coating onto the parts.

The facility has two vapor degreasing units which are used to clean the parts before coating them. One of the units is no longer used, though it is still located at the facility.

## **INSPECTION NARRATIVE**

I arrived at the facility and met with Mr. Kopacz, who is the owner and president of the company. Initially, we discussed the operations at this 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 business is more powder coat than liquid coat currently.

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 the coating lines, 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-PYROBURNOFF the following conditions were evaluated:

**3.1 Compliance – PM emissions are limited to 0.1 pounds per 1000 pounds exhausted air, corrected to 50% excess air. No stack test has been performed, and there is no reason to request a stack test. The oven was not operating during the**

onsite inspection. During pre-inspection surveillance no visible emissions were observed from any of the stacks.

**3.2 Undetermined – The oven was not operating during the onsite inspection. During surveillance in the general area, no VEs have been observed from any stacks at the facility.**

**3.3 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 Compliance – The oven has been installed properly and the afterburner was operating properly during the onsite inspection. The afterburner operates at 1500 F.**

**3.5 Compliance – 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. During the onsite inspection, this equipment did not contain any solvent.**

**For EU-VAPORDRGR#2**

**5.1 Compliance – The facility appears to be operating properly according to 40 CFR 63 Subpart A and T. During the onsite inspection, this degreaser was not being used, and was in the closed position.**

**5.2 Compliance – The facility is complying with all the work practice standards required by this permit.**

**5.3 Compliance – The facility is operating this vapor degreaser in compliance with 40 CFR 63.463.**

**5.4 Compliance – The control equipment appears to be operating properly. No exceedances have occurred since the last inspection.**

**5.5 Compliance – PTE calculations were made during the permitting process. No changes have been made to the process that would affect these calculations.**

**5.6 Compliance – Proper records are maintained for this equipment and are kept on site. These records were reviewed during the onsite inspection. A daily log book with all calculations is maintained.**

**5.7 Compliance – All reports are submitted in a timely fashion.**

#### **For FG-OVENS**

**6.1 Compliance – No emission verification testing is required at this time.**

**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 500 pounds for 2021, which is less than the monthly permitted limit of 2,000 pounds.**

**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 1.7 tons of VOCs per during 2021, which is under the permitted limit of 90.0 tons per year. The facility emitted less than 1.7 ton of HAPs during 2021, which is less than the permitted limit of 9 tons of individual HAPs or 22.5 tons of aggregate HAPs. Based on a review of the records, the 12 month rolling time period VOC emissions through June 2022 was 1.85 tons and the HAP emissions for the same period was 0.85 tons.**

**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.**

**The powder coat line is exempt from permitting by Rule 287 (d).**

### **MAERS REPORT REVIEW**

**On February 18, 2022 I reviewed the MAERS. The report was received on February 8, 2022, which was on time. The reported emissions were reviewed and appear to have been accurately reported.**

### **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



DATE

7/14/2022

SUPERVISOR

JK