DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B869326067

FACILITY: SPINA ELECTRIC CO		**SRN / ID:** B8693
LOCATION: 26801 GROESBECK HWY, WARREN		**DISTRICT:** Southeast Michigan
CITY: WARREN		**COUNTY:** MACOMB
CONTACT: Douglas Ouvry ,		**ACTIVITY DATE:** 07/17/2014
STAFF: Joyce Zhu	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Annual insepction		
RESOLVED COMPLAINTS:		

On 6/17/2014, Sam Liveson and I from Air Quality Division (AQD) conducted an annual inspection at Spina Electric Co. The facility is located on 26801 Groesbeck Hwy., Warren. The purpose of the inspection is to verify the compliance status of the operation in accordance with Air Quality Regulations and their Air Use Permits. Mr. Douglas Ouvry from the company met with us. We explained the purpose of the inspection.

Inspection:
The company is in the business of fixing electric motors. The operation hours are 6:30 AM to 5 PM. The permit-exempted devices are a part washer and a 30-gal cold cleaner. They used hot water with high pressure in the washer to wash off the oil from the motors; waste water from the washer is taken away by ZEP, a company who provides cleaning products. The cold cleaner is not subject to MACT standard and exempted by Rule 281(h) because the air/ vapor interface is less than 10 square feet; and they use DYNA 143, a naphtha solvent in the unit. ZEP is responsible to replace the solvent & filter inside the unit. During the inspection, they didn't operate the cold cleaner. The unit was equipped with a draining device; they left the unit open when not in use. When I pointed the practice out, Doug said the painter was just using the unit; & Doug closed the cover on the unit. I've also notice that there were no operating procedures posted near the unit regarding to compliance of Rule 707. At the end of the inspection, I gave Doug a copy of the operating procedures. He posted it immediately.

Permit #382-81
This permit covers a paint spray booth. During the inspection, there was some overspray inside the booth. They change the filters on a weekly basis. Water base paints are used in the booth. Air assisted spray gun is used here. They do not measure any paint viscosities prior to painting. If the paint is too thick, they will add water. Also, water is used to clean the spray nozzles. Paints were stored in a room next to the booth. I did not observe any spill in the storage area. All containers were closed during the inspection. They only operate the booth around four hours a day. When we almost left the coating area, I observed that a painter was painting outside of the booth. After I told the company they had to operate the coating process inside the booth, the painter immediately went inside the booth. The company has kept the paint usage record. According to record, they used no more than 50 gallons of coatings per month during the period from July 2013 to April 2014. The operation could be exempted from PTI according to Rule 287 (c). Permit #382-81 limits VOC emission to 5.14 lb/hr & 22.5 T/yr. I told Doug that if he wanted to keep the permit, he needed to obtain a Title V permit because there is no legal limit to restrict HAP emission. Otherwise, he could void the permit & utilize Rule 287(c), the exemption rule, for the operation.

Permit #257-10

This permit covers a burn-off oven with a secondary afterburner. Before being repaired, electric motors are sent to the oven to remove the varnish coating. By heating the motor, the copper winding inside the motor is softened. As a result, they can remove the old copper wires. During the inspection, they did not operate the process. Doug was able to show us the temperature setting for the secondary chamber was at 1800 F which was in compliance with the permit requirement of minimum temperature of 1400 F. There are automatic temperature control systems for the primary as well as the secondary chambers. They have installed an interlock system that would shut down the primary chamber burner when the secondary chamber is not operating properly. During the inspection, we noticed that the stack from the process had a rain cap on. I told Doug that the permit required the exhaust to be discharged unobstructed vertically upwards to the ambient air from a stack. Later, the company replaced the cap with a rain sleeve. Permit condition VI.2 requires the company to calibrate the thermocouples with primary & secondary chambers at least once per year; however, the company didn't conduct the calibration. Doug said it was hard to find such company who could conduct the calibration at such high temperature. Permit Condition VI. 1 requires the company to continuously keep the afterburner temperature; however, the company just ordered the components to record the temperature via a e-mail of 7/24/14 from Doug. I told him this is a violation. The company keeps the following records:

1. A current list of the MSDS of each materials processed in the burn off oven.
2. Information regarding to automatic temperature control system & interlock system.

In conclusion, although the company has corrected many deficiencies identified throughout the inspection, there are two violations identified during the inspection:

1. There was no temperature records for the afterburner.
2. The company has not calibrated the thermalcouples associated with primary as well as secondary chambers on a yearly basis.

A Notice of Violation letter will be sent to the company. Also, the company needs to decide if they want to use Rule 287 (c) for the coating operation or obtaining ROP, a Title V permit.

NAME [signature] DATE 7/24/14 SUPERVISOR CJE