

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

M384764085

FACILITY: RIM CUSTOM RACKS		SRN / ID: M3847
LOCATION: 6501 E MC NICHOLS RD, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Michael Schorer , Chief Financial Officer		ACTIVITY DATE: 08/15/2022
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: EPA Inspection		
RESOLVED COMPLAINTS:		

On August 15, 2022 I accompanied staff from the United States Environmental Protection Agency (EPA) for their inspection of RIM Custom Racks (source), located at 6501 E. McNichols Rd, Detroit, Wayne County. Natalie Schultz(Schulz.Natalie@epa.gov, 312-886-2776) and Brianna Fenzl(Fenzl.Brianna@epa.gov, 312-886-1960) represented EPA.

The purpose of the inspection was to determine the source 's current compliance status with the federal Clean Air Act of 1990, as amended; Part 55 of Michigan Public Act 451 of 1994, as amended; the administrative rules, and the conditions of PTI No. 211-06B.

I arrived around 2PM and waited for the staff from EPA to arrive. Brianna and Natalie arrived around 2:20PM. As we were preparing to enter the main office, we were approached by Michael Schorer, Chief Financial Officer. We made introductions and Brianna and Natalie explained the purpose of the visit. Michael explained that the company only operates until 2:30PM and that he had to attend to a personal matter. Brianna and Natalie said that they could not reschedule so Michael said he would call Anthony Schorer, Chief Information Officer, who was more knowledgeable about the environmental compliance aspects of the facility.

Brianna and Natalie requested a tour of the facility. Michael explained that they only had one booth operational that is used to coat metal racks. The facility had three booths several years back. We walked into the area where Booth 6475 was located. The booth consisted of two walls with filters and was not fully enclosed. The filters are changed around twice a week. The metal racks that are coated can range anywhere from 4 x 4 ft to 15 x 8 ft. We also went into two areas of the facility where racks are assembled and where the racks are fabricated using welding. After a tour of the facility, Anthony joined us. Brianna and Natalie asked about tracking paint usage. Anthony explained that the painters record the level of the drums containing paint before and after usage. The sheets where the level is tracked is logged into a spreadsheet and records and emission calculations are handled by a consultant(Qaiser Baig, Cornerstone Environmental). After the discussion, Brianna and Natalie said there may be a request for records in the future. We left the facility at 3:15PM.

I requested records on August 25, 2022. I received records from the company on September 2, 2022.

BACKGROUND & PROCESS DESCRIPTION

- The source began in 1978 by repairing and repainting material handling racks and containers for the automotive industry. They soon expanded their services to designing, building, and modifying custom racks and containers and have recently broadened their client base to include numerous industries.

- The source employs about 100 people and operates one 8-hour shifts and five days per week.

- Opt-out PTI 211-06A was issued to the source in January 2007. Below threshold limits for VOC and HAPs were imposed by PTI 211-06A. Facility took restrictions on xylene in coatings.

- A Violation Notice was issued January 29, 2019 for exceeding material limitations. PTI 211-06B was issued on August 23, 2019 to resolve the Violation Notice.

- PTI 211-06b covers the following Emission Units and Flexible Group:

1) EU6475-BOOTH: One (1) miscellaneous metal parts spray paint booth

2) FGFACILITY: All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.

EU6475- EU6475BOOTH

* S. C. #1.1 – stipulates that the VOC annual emission rate not to exceed 50 tpy, based on a 12-month rolling time period as determined at the end of each calendar month.

Compliance- The highest annual VOC emission rate of 26.12 tpy, based on a 12-month rolling time period as determined at the end of each calendar month, was reported for May 2021.

* S. C. #1.2 - stipulates that the VOC content in the used coatings not to exceed 3.5 lb/gal on a daily volume weighted average.

Compliance -For VOC contents in the coatings used, the source depends solely on the data provided in each coating's SDS. SDS of the most common coatings were provided by the source following the inspection, and are available in the file. Also, a review of the VOC content in the coatings database appears to show that coatings meet the permit requirement. A review of the

daily coating usage appears to show the facility is in compliance with their permit requirements. All coatings are received, by source, in a ready-to-use condition. No thinning or viscosity adjustment is performed by the source.

* S. C. #III.1 – Stipulates that waste coatings and solvents shall be captured and stored in closed containers.

Compliance- During the inspection, open containers of waste coatings and solvents were not observed.

* S. C. #III.2 - Stipulates that the spent filters shall be disposed in a manner which minimizes the introduction of air contaminants to the outer air.

Compliance- According to Michael, the source manifests the spent filters, as they are shipped off site for proper disposal.

- Dry filters are installed on both sides of EU6475-BOOTH. During the inspection, the filters appeared to be in good working order. According to Michael, filters are replaced twice a week.

* S.C. #III.3- Stipulates that all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, be handled in a manner to minimize the generation of fugitive emissions.

Compliance- During the inspection, the facility was not operating. It appeared that materials were handled in a manner that minimized fugitive emissions. The booth was not fully enclosed. However, it appeared that there was minimal overspray.

* S.C. # IV.1- Stipulates that the booth not operate unless all respective exhaust filters are installed, maintained, and operated in a satisfactory manner.

Compliance- Booth was not operating at the time of the inspection. The filters appeared to be in good condition. Michael said that the filters are replaced twice a week.

*S.C. # IV.2- Stipulates that airless applicators or comparable technology be equipped with use in the booth.

Compliance- Michael said that Airless applicators manufactured by Graco are used in the booth.

* S. C. #V.1 - stipulates that the VOC content, water content and density of any coating or solvent, as applied and as received, shall be determined using federal Reference Test Method 24.

Undetermined-The source has never conducted chemical analysis, on the coatings used, pursuant to USEPA Method 24. The VOC contents in the coatings used are based on the data provided in each coating's SDS.

*** S. C. #VI.1 - stipulates that all required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month.**

Compliance- Records were received.

*** S. C. #VI.2 - stipulates that a current listing from the manufacturer of the chemical composition of each coating or solvent, including the weight percent of each component shall be maintained. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.**

Compliance- Records were requested and are available in AQD's file.

*** S. C. #VI.3 - stipulates that the following information for EU6475-BOOTH shall be kept:**

a) Daily gallons (with water) of each coating and solvent used.

b) VOC content (minus water and with water) of each coating and solvent as applied.

c) VOC emission calculations determining the volume-weighted average VOC content of the coatings as applied on a calendar day basis.

d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.

e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The source shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.

Compliance- Records were submitted on September 2, 2022.

FGFACILITY

*** S. C. #I.1 through I.4 – stipulate that the HAPs individual, aggregate, and VOC annual emission rates not to exceed 9.0 tpy, 22.5 tpy, or 90 tpy, respectively, based on a 12-month rolling time**

period as determined at the end of each calendar month. Cumene emission rates shall not exceed 0.34 tpy.

Compliance- The highest annual VOC emission rate of 26.21 tpy, based on a 12-month rolling time period as determined at the end of each calendar month, was reported for May 2021. The highest total HAPs emission rate was 1.35 tpy(Feb 2019) and individual HAP emission rate was less than 0.5 tpy.

* S. C. #V.1 – stipulates that the HAP content of any coating or solvent as received and as applied, using manufacturer’s formulation data shall be determined. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer’s HAP formulation data using EPA Test Method 311.

Undetermined- the source relies on SDS for HAP content of coating. Because of the usage, there has not been reason to suspect otherwise that the coating content is exceeding the material limits.

* S. C. #V.2– stipulates that the VOC content, water content, and density of any coating or solvent, as applied and as received, using federal Reference Test Method 24 shall be determined.

Undetermined- According to facility in previous inspections, the source has never conducted chemical analysis, on the coatings used, pursuant to USEPA Method 24.

* S. C. #VI.1 - stipulates that all required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month.

Compliance- Records were submitted on September 2, 2022.

* S. C. #VI.2 - stipulates that the following information for EU6475-BOOTH shall be kept:

- a) Gallons or pounds of each HAP containing material used.
- b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.

d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.

e) Individual and aggregate HAP emission calculations determining compliance with Special Condition Nos. 4.1a through 4.1c as determined at the end of each calendar month.

The source shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.

Compliance- Records were received on September 2, 2022.

* S. C. #VI.3 - stipulates that the following information for EU6475-BOOTH shall be kept:

a) Daily gallons or pounds of each VOC containing material used.

b) Where applicable, gallons or pounds of each VOC containing material reclaimed.

c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.

d) VOC emission calculations determining the monthly emission rate in tons per calendar month.

e) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The source shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.

Compliance- Records were received on September 2, 2022.

Permit Exempt Equipment

-Welding Equipment- 25 Welding equipment, 4 Protoype, 7 for Repairs- Equipment is exempt under R 336.1285 (i)

-No Parts Washer

-No Generator

-Natural Gas Furnace below 10MMBTU/hr heat input- Equipment is exempt under R336.1282 (b) (i)

-Shot Blast Room- Not operating- Vented inside- Equipment is exempt under R 336.1285 (I)(vi).

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A

MAERS REPORT REVIEW

Pollutant	2021 Emissions(TPY)
VOC	19.8

CONCLUSION:

The source appears to be compliance with the air quality rules and regulations and the conditions of PTI No. 211-06B.

NAME JORGE ACEVEDO

DATE 9/15/2022

SUPERVISOR APRIL WENDLING 10/18/2022