

M4260
MAMILL

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

M426030462

FACILITY: Big 3 Precision		SRN / ID: M4260
LOCATION: 10800 FORD RD, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT: Adam Miller , Director of Operations		ACTIVITY DATE: 07/31/2015
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Inspection of a minor Source		
RESOLVED COMPLAINTS:		

On July 31, 2015, I conducted a Scheduled Inspection at Big 3 Precision (facility), located at 10800 Ford Rd., Dearborn. The purpose of the inspection was to determine the facility's compliance with the Federal and State Air Acts, the MDEQ-AQD rules, and the conditions of PTI No.187-14.

Mr. Adam Miller, Director of Operations, represented the facility during the inspection.

Big 3 Precision bought and occupied this location from EPI Exhibits, who formally owned and occupied this building.

PTI No. 426-85, which was issued to EPI Exhibits (on 9/25/85) should be voided, as EPI Exhibits has sold and vacated the above building. This PTI should be voided.

The source may be subject to the provisions of area source MACT 40 CFR, Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Even though the AQD does not implement this MACT standards, the source was abreast of it.

FACILITY INSPECTION:

- The facility manufactures and paints metal racks for the automotive industry.
- The facility utilizes shears, welding machines, a natural gas fueled air make up system and paint booths for the rack manufacturing process.
- In November, 2014, the facility has originally applied for a PTI for 3 spray paint booths. On November 18, 2014, General PTI No. 187-14 was issued to the facility for one or more coating lines.
- In January, 2015, the facility constructed 2 spray paint booths. It anticipates adding a third booth in late August/early September, 2015 as its business picks up.
- In the spray paint booths, the facility uses Sherwin-Williams waterborne enamel with a 2.46 lb/gal VOC content. Attachment A is a copy of the enamel's MSDS. The coating does not contain volatile hazardous pollutants (VHAPS). Attachment A.1 is a copy of the enamel's description and characteristics. No solvents are used for thinning or viscosity adjustment.
- The facility estimated the paint usage in both booths as follows (Attachment B):
 - 1) May, 2015: 20 gal – VOC Emissions = 49.2 lb
 - 2) June, 2015: 40 gal – VOC Emissions = 98.4 lb
 - 3) July, 2015: 200 gal – VOC Emissions = 984 lb

The facility keeps paints purchase orders (not reviewed) on file.

The above data are in compliance with S.C. #1.1 of FG-COATING and S.C. #1.1 of FG-SOURCE.

Compliance with S.C. #1.2 of FG-COATING will be evaluated after 12 months of operations.

- Attachment C is a description regarding the process that the facility follow to ensure the capture and proper disposal of all purge/clean-up solvents and waste coatings from all coating applicators used in FG-COATING. This is in compliance with S. C. #III.
- HVLP spray guns are used. This is in compliance with S.C. #IV.1 of FG-COATING and R 336.1702(d).
- Each spray paint booth is equipped with dry filters. This is in compliance with S.C. #IV.2 of FG-COATING and R 336.1224.
- The facility is able to comply with VOC emission limits of PTI No. 187-14 without the need for thermal or catalytic oxidizers. Therefore, the provisions of S. C. #IV.3 - S. C. #IV.5 are not applicable currently.
- In it's PTI Application, the facility specified the stack of each spray paint booth to be 12.5 feet tall and unobstructed, which will accommodate a height of at least 1.5 times the building height of 25 feet. This is in compliance with S. C. #VIII.1.
- The facility does not have a vapor degreaser.
- The facility does not have ovens or boilers.
- The facility runs 5 days per week & 1 shift per day.
- The facility employs only 20 full time employees.
- There are no significant VOC emissions.
- The facility is not subject to MAERS filing.

CONCLUSION:

The facility appeared to operating in compliance with the Federal and State Air Acts, the MDEQ-AQD rules, and the conditions of PTI No. 187-14.

NAME Sean Amer DATE 8/13/15 SUPERVISOR JK