

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

N080257128

FACILITY: ALBAR INDUSTRIES, INC.		SRN / ID: N0802
LOCATION: 780 WHITNEY DR., LAPEER		DISTRICT: Lansing
CITY: LAPEER		COUNTY: LAPEER
CONTACT: Andrew Woodruff , Human Resources Manager		ACTIVITY DATE: 01/20/2021
STAFF: Robert Byrnes	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: FY 2021 Scheduled Inspection.		
RESOLVED COMPLAINTS:		

On January 20, 2021, I visited the Albar Industries facility to conduct an air quality inspection. I arrived at the facility at 1:05 pm and met with Andy Woodruff and Al. We began the inspection by going over what information we would be looking for, then proceeding with the walk-through portion of the inspection to see each emission unit in the permit. Afterwards a follow up discussion and collection of some permit records and further discussion. After going to the facility, I conducted an odor survey in the surrounding area. No odors were detected as winds were very light. I did notice level 2-3 paint odors directly in front of the Albar facility at the cul-de-sac.

Albar Industries Inc., paints plastic and metal parts for the automotive industry. The facility is a major source of VOC and is cover by ROP MI-ROP-N0802-2020. The facility currently has 3 chain on edge paint lines (LN1, 2 & 3), a small booth for prototypes (LN4) and testing coatings and the new spoven (LN5). Line 2 was not in operation but is mostly used for extra production that may be needed at the facility. Andy stated they do run the line a couple times a year to keep it operational. I mentioned I had seen the limited usage in the quarterly VOC reports. Line 1 was in operation during the inspection but also has had some limited usages as observed in the quarterly VOC reports. There also was the pre-production hydro-coating tank but no usages have yet to be reported. Line 3 is currently running mostly plastic parts (spoilers, calipers, door handles, exterior pieces, vent trim for interior, etc.) with some metal parts in between. The facility has been running 1.5 shifts, 4 days per week Monday through Thursday from 6:00 am to 8:00 pm for line 3. This results in 4 days per week, 10 hours per day work shift for staffing Monday through Thursday with only limited Fridays used as overtime this year to catch up on painting.

Burn-off Oven is a heat cleaning oven primarily used to clean paint racks and associated fixtures for the coating lines. The burn off oven is equipment with an afterburner and is required to be operated at a minimum of 1400 degrees Fahrenheit. A visual inspection of the oven showed some recent repairs no the unit appeared completely sealed up with no visual holes or missing insulation. Copies of the afterburner temperature records were obtained for December 2, and December 29, 2020. The wheel charts show both the interior bake oven temperature and the stack afterburner temperature which was above the minimum 1400 degrees Fahrenheit operating requirement. The controller, high limit, recorder #1 and #2 had their thermo couples calibrated on July 27, 2020 by PYRO Service Company. The next calibration due date is July 27, 2021.

Coating Line 1 has a 1989 natural gas fired water heater which generates hot water for the parts washer proceeding line 1 coating operations. The parts washer line is totally dedicated to coating line 1. In 2001 the washer was converted from a floor conveyor to an overhead conveyor. After

	1501 degrees Fahrenheit (previously 1503, 1528)	1480 degrees Fahrenheit MACT
RTO Duct Static Pressure	2.60 (previously 2.25-2.9, 2.6 - 3.25)	2.58" WC (although sometimes the instantaneously value is out of range, the permit requirement is based upon a 3 hour average)
Fluidized Bed Desorb Temperature	463.2 degrees Fahrenheit (previously 438, 446-463)	445 Degrees Fahrenheit (+/- 15 degree's)
Fluidized Bed Pressure Drop	1.0159" WC (previously 0.99, 0.9545)	0.9647 (although sometimes the instantaneously value is out of range, the permit requirement is based upon a 3 hour average)

Tested Parameter	Test Result	Date Tested
Capture Efficiency – Basecoat Booth Line 3	Not readily obtained	06/21/2016
Removal Efficiency – Fluidized Bed Concentrator	95.0%	12/07/2017
Destruction Efficiency – 3 Chamber Regenerative Thermal Oxidizer	93.9%	12/07/2017

0.0174 # HAP/# SOL (for MACT PPPP)	NA	0.16 # HAP/# SOL	Yes
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VOC Calculation Discussion:

A review of the quarterly VOC records for the months of October 2020 was reviewed as part of this inspection. Review of this information shows the gallons of paint sprayed on all 5 lines each day, the average VOC content and the amount of VOC sprayed. All records were below their respective emission units for Lbs VOC/gallon, lbs VOC/day and tpy VOC.

Boiler 1 & 2/MACT DDDDD The facility has 2 small natural gas fired boilers (2.499 MMBtu/hr each) that are subject to MACT DDDDD. A copy of the last boiler tune-up was obtained from January 26, 2016. The subsequent boiler tune up was past due 6 days as of this inspection. It was asked that Albar Industries Inc. conduct tune-ups on the boilers ASAP and to report the days in the next deviation reports. A reminder email was also send on April 8, 2021.

Maintenance Department has various machining, drilling, cutting equipment exempt under Rule 285(l)(vi)(B). The area also has welding and torching equipment exempt under rules 285(i) and 285(j).

ROP Discussion: An ROP discussion was held as part of this inspection. The ROP renewal was issued in 2020. We discussed the issue of conducting Method 24 testing on at least 5 coatings per year as discovered during the renewal process. Method 24 testing results was covered in a different section of this report.

Meaningful Change:

The previous inspection discussed the new AQD Policy AQD-025 which is for a Permit Exemption (Rule 285) for Changes in Process or Process Equipment that are not a Meaningful Change or a Meaningful Increase in Toxic Air Contaminants.

Method 24 Results

No paint samples were collected for Method 24 analysis this inspection. Albar industries does conduct its own Method 24 tests for quality assurance on their VOC Records. Paint supplier PPG provides regular certifications with Method 24 information. Other coatings are tested in house. The results from the in-house M24 testing by Albar Industries was obtained. They used the tests to verify the newer military coatings being used would comply with their lbs VOC/gallon permit limits.

NAME _____

DATE _____

SUPERVISOR _____