

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

N081445920

FACILITY: PPG INDUSTRIES INC		SRN / ID: N0814
LOCATION: 3601 JAMES P COLE BLVD, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Tim Richards , Regional EHS Specialist		ACTIVITY DATE: 09/05/2018
STAFF: Samantha Braman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Safety Equipment Required: Steel-toed boots and safety glasses.

Purpose: Unannounced, scheduled inspection for compliance with state air regulations.

Location: PPG is in the city of Flint in an industrial park just east of 475.

Facility Background/Regulatory Overview: PPG is a test and development center for coatings and coating processes for various automakers.

PPG is considered a minor source of air emissions. The facility operates under exemptions.

A major source has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns. It is also considered a minor area source for Hazardous Air Pollutants (HAPs), because it was not considered to have a PTE of 10 TPY or more for a single HAP, nor to have PTE of 25 TPY or more for combined HAPs.

Fee Status: This facility does not belong to a category fee and is not required to report to MAERs.

Inspection:

Arrived: 10:00 AM

Departed: 12:15 PM

The last inspection was done in March 2008 and no violations were noted. There have been no complaints for PPG.

There were no visible emissions from the facility upon arrival. No odors were identified on Grand River approaching the facility or surrounding the complex.

I was greeted at the guard shack by Austin Christy, Process Engineer. He informed me that Tim Richards, Regional EHS Specialist, was away at a training all week. Austin and I first met in a conference room to discuss anything that has changed or any new equipment in the past ten years. Next, we went on a tour of the ADC building, then over to the EDC Building and lastly the BDC Building (Previously known as the Transplant Building). There are 15-20 employees at this facility. They operate on 2 shifts, working four 10-hour days.

No.	Building Location	Emission Unit	Comp. Status
1	ADC	Spray Booths North, South and APAD	C
2	ADC	Training Booth	C
3	ADC	Powder Spray Booth	C
4	ADC	Curing Oven	C
5	ADC	Hand Spray Booth	C
6	ADC	Flame Treatment	C
7	EDC	(2) Dip Tanks	C

8	EDC	Curing Oven	C
9	EDC	(2) Small Dip Tanks	C
10	BDC	Small Spray Booth	C
11	BDC	Large Spray Booth	C
12	Various	Cold Cleaners	C
13	Various	Boilers	C

ADC Building

1 & 2 – Spray Booths North, South and APAD and Training Booth: APAD stands for Automotive Parts and Decorative. One of the booths is named this because that is the team that primarily use that booth. Three robotic spray booths that do both base coat and clear coat. All operate on a down draft filter system. Filters are changed as needed. There is also a week in July and a week in December that the facility quits running and does maintenance on the sprayers and changes out the filters. Each booth has 1-3 exhaust fans, and each exhaust fan has its own stack; therefore, each booth has 1-3 stacks. I could see no visible emissions from any of the stacks. The Training Booth is a new booth that was installed around 2014. The purpose of this spray booth is for training needs. Staff learn to operate and maintenance the robot and learn about hand spraying techniques. This booth is used very little, maybe (2) 10x10 panels get painted per month. All paint is water based. All the spray booths in this building have their own intake air to control temperatures. North, South and APAD paint booths were operating during my inspection. **All spray booths exempt per 287(c).**

3 – Powder Spray Booth: This booth is only used on one shift for about one week out of the month. The powder is reclaimable. They vacuum the powder off the filters and then are able to reuse the powder and reuse the filters. **Exempt per 287(d).**

4 – Curing Oven: Oven operates anywhere from 180-300? with an average of 285?. This oven is used to cure parts coming out of Spray Booths 1 and 2. Austin stated that it is not used on a regular basis; maybe only 1 or 2 weeks per month at most. **Exempt per 287(c).**

5 – Hand Spray Booth: This booth is used very little, they now use it as storage for some of their hazardous waste drums. Austin stated that this booth was maybe used for one car in the past year. When it is used they have airless and pressure guns for application. **Exempt per 287(c).**

6 – Flame Treatment: This is a newer piece of equipment that has been installed. This is a natural gas burning flame treatment robot. It is used to heat plastic bumpers and other items to help paint adhere to the piece more effectively. **Exempt per 282(b)(i).**

EDC Building

7, 8 & 9– Dip Tanks and Curing Oven: There are two large electrocoating dip tanks at the facility. The object being coated gets hosed down with ionized water, then dipped into the e-coat, then rinsed again and finally it is sent to the curing oven. E-coat bath usually kept at around 90?. The curing oven serves both e-coat dip tanks. The two small dip tanks are little portable tanks. **Exempt per 290.**

BDC Building (formally Transplant Building)

10 – Small Spray Booth: The small booth is not used very often, maybe one to two weeks per month. This booth only does approximately 2 jobs per hour. Filters are changed as needed. The air in the building is used to vent the booth. **Exempt per 287(c).**

11 – Large Spray Booth: Austin informed me that this booth is used for spray on bed liner that contains no VOC. It utilizes mesh media filters. Clean air is used for air intake and tis then vented outside. The operator of this booth stated that the filters are changed once a week or sooner as needed. The filter is blue, so when the filter gets noticeably dirty they replace it. **Exempt per 287(c).**

Various Buildings

12 – Cold Cleaners: There are 4 cold cleaners total. In the ADC Building there are two in the North mix room and one in the South mix room. There is one other one in the BDC Building. All operate under **Exemption 281**

(h).

13 – Boilers: There are two steam boilers located in the upstairs of the ADC Building. The purpose of these boilers is to provide steam humidity for the spray booths, because of this they are typically ran more in the winter. Boiler A was running at 8% during my inspection and Boiler B was not running. The two boilers alternate which one runs based on steam demand. Boiler A was installed in 1997 and has a BTU of 10,000,000. Boiler B was installed in 1989 and has a BTU of 6,000,000. There is also a 2950M BTU hot water heater that was built in 2000. It is in the EDC Building and is used to heat the water in the E-coat tanks. This was not running during my inspection, as it runs mostly in the winter months. All boilers run off natural gas and operate under **Exemption 282 (b)(i)**.

Concerns:

Recommend keeping mesh filters in spray booths taut as to not allow fugitive emissions.

Recordkeeping: Tim Richards, the Regional EHS Specialist for PPG sent me the following records:

- SDS for purge solvent,
- SDS for typical water-based paint,
- SDS for typical solvent-based paint,
- SDS for E-coat bath
- Usage tracking for spray booths: North Booth-211.81 gal/year; South Booth-128.90 gal/year; APAD Booth-90.19 gal/year
 - Based on the information sent to me, it appears the spray booths are using less than the 200 gal per month maximum stated in Exemption 287(c).
- Emissions of the e-coat process: 46 lbs/month
 - Based on the information sent to me, it appears the e-coat dip tanks are emitting less than the 500 pounds per month as stated in Exemption 290.

These documents will be included as attachments with this report.

NAME

Sam Haberbrun

DATE

10/12/18

SUPERVISOR

D. M.

