

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

N091768317

FACILITY: SPRAYTEK INC		SRN / ID: N0917
LOCATION: 2535 WOLCOTT, FERNDALE		DISTRICT: Warren
CITY: FERNDALE		COUNTY: OAKLAND
CONTACT: Susan Apczynski , Quality Assurance Manager		ACTIVITY DATE: 07/25/2023
STAFF: Owen Pierce	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2023 Inspection		
RESOLVED COMPLAINTS:		

On July 25, 2023, I (Owen Pierce EGLE - Air Quality Division) performed a scheduled targeted inspection of Spraytek Inc. located at 2535 Wolcott, Ferndale, Michigan. Adam Bognar (EGLE-AQD) joined me for the inspection. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and the conditions of Permit to Install (PTI) No. 143-04D. Upon arrival, Adam and I met with Susan Apczynski, Manager, and Kip Harrison, Operations Manager, and conducted a pre-inspection meeting where we introduced ourselves, presented our credentials, and stated the purpose of the inspection.

During the pre-inspection meeting, Kip explained the facility's processes and equipment. Spraytek Inc. is a metal finishing company that provides corrosion protective coatings to automotive parts; primarily underbody parts. Operating equipment found in PTI No. 143-04D includes: one chain-on-edge coating line, two dip-spin coating lines, one metal parts processing line consisting of a series of eight pretreatment stages, and three spray booths. The facility has 46 employees and operates around the clock in 3 different shifts. According to Susan and Kip, there have been no recent process or equipment changes.

Non-permitted equipment at Spraytek includes one boiler used to produce steam. Following the pre-inspection meeting, Susan and Kip lead us on an inspection of the facility.

Facility Walkthrough Observations

EUBATCH2, EUBATCH 1, and EUBATCHJR are all cross-draft spray booths. We observed each spray booth, and the air-cleaning control devices for each are dry filters. The dry filters control particulate matter (PM) emissions. The the dry filters for each booth were properly installed and we observed pictorial instructions affixed to the outside of EUBATCH2 as a reference showing the proper way to install the filters.

EUWASHLINE contains two downdraft spray booths (Booth 1 & Booth 2). Booth 1 is an automated spray booth and Booth 2 is a manual spray booth. I observed the EUWASHLINE Booth 1 and Booth 2 air-cleaning control devices, which consist of dry filters. The EUWASHLINE dry filters were properly installed underneath the floor grates in Booth 2 and were properly installed underneath and on top of the grates in Booth 1. This method in Booth 1 not only reduces the potential for control device bypass but it also reduces the frequency of replacing the filters installed below the floor grates.

While inspecting the Paint Mixing Room, we observed that all VOC and HAP containing materials including coatings, reducers, solvents, and thinners were properly covered to minimize fugitive emissions.

On July 29, 2022, Spraytek received a violation notice for failing to install their dry filters in a satisfactory manner in EUBATCH2 and EUWASHLINE - Booth 1, which resulted in gaps that allow particulate material to bypass the control device and for failing to handle a one-gallon can of acetone in a manner to minimize the generation of fugitive emissions by leaving the can uncovered when the operator was absent. AQD received a written response on September 15, 2022, that indicated all violations had been corrected. Observations made during the inspection confirm that the dry filters are correctly installed and acetone containers are properly covered and support the resolution of the violation.

Waste materials were observed as being stored in closed 55-gallon drums and according to Susan and Kip the waste is picked up once a month by Waste 365. Spent filters are watered down and then disposed of in trash bags. Kip explained that filters are replaced when they are face loaded meaning that visually the entire face of the filter is covered with coating.

We observed one CB Packard natural gas fired boiler during the walkthrough. The boiler has a max heat input of 4.184 million BTU and is exempt from Rule 336.1201 (Permit-to-Install) pursuant to rules 336.1282(2)(b) (<< 50 million BTU per hour heat input, natural gas only), and is not subject to New Source Performance Standards (NSPS) Subpart Dc (<< 10 million BTU per hour heat input, natural gas only).

All other emission units and corresponding control devices were observed as being properly operated and maintained.

PTI No. 452-85C Compliance Evaluation

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The facility keeps monthly records of the types of coatings used, gallons of coatings used, VOC content of each coating applied, and VOC emissions per month in pounds and per year in tons per 12-month rolling time period. The facility also keeps a current listing from the manufacturer of the chemical composition of each coating, and the facility provided me the SDS sheets of the top four coatings most used at the facility.

Special Condition (SC) V.1 states that the facility shall determine the VOC content, water content, and density of any coating, as applied and as received, using federal Reference Test Method 24. The facility may use the VOC content from the manufacturer's data only upon the prior written approval by the AQD District Supervisor (DS). Susan explained that at least since she has taken over as the EHS manager, they receive their coatings, with determined VOC contents, from their parent company Mangi Group, Inc. We explained the stipulation in the permit and explained that they would need to send a letter to the DS to request the use of the manufacturers data instead of the Method 24 testing. Susan told us that she will get to work on getting the approval from the DS. No violation notice will be issued at this time.

Susan provided records of the gallons of coating used, VOC content, and VOC emissions for all emission units both individually and collectively for July 2022 - June 2023. VOCs are calculated using a mass balance, and VOC emission factors used in the calculations are pulled from the manufacturers formulation data for each coating used. After analyzing the records, the VOC emissions appear to be correctly calculated. According to the records, VOC emissions for all emission units individually were under the 10 tpy 12-month rolling limit stated in SC I.1 and under the 2000 pounds per month limit stated in SC I.2. The highest individual 12-month rolling VOC emission was EULINE2 in June 2023 with 7.89 tpy, and the highest monthly individual VOC emission was EUNUMBER8 in March 2023 with 1,979.76 pounds.

The records also showed that the VOC emission data for all the emission units collectively were under the 30 tpy limit stated in SC I.3. The highest collective 12-month rolling VOC emission occurred in June 2023 with 21.68 tpy.

The facility keeps filter inspection and replacement records on a monthly basis as required in SC VI.5. As previously stated, Kip explained that they change their filters when they are face loaded, which is approximately every 2-3 days.

In compliance with the training requirements of Appendix A - Fugitive VOC Emissions and Odor Control Plan, the facility provided documented VOC emission and odor control training records from July 2022 - June 2023.

Susan provided pressure test records for their high volume low pressure (HVLP) applicators, recorded on a monthly basis as required in SC VI.6. Pressure readings recorded from July 2022 - June 2023 did not exceed 10 psig as required in SC IV.2.

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The facility keeps monthly and annual records of the gallons of each HAP containing material, the HAP content in pounds per gallon of each HAP containing material, and the individual and aggregate HAP emissions tons.

According to the records, individual 12-month rolling HAP emissions were under the 9 tpy limit required in SC I.1. The highest individual 12-month rolling HAP emission recorded was Butyl Alcohol (CAS No. 71-36-3) with 1.48 tpy in March 2023. The records also show that the aggregate 12-month rolling HAP emissions were under the 22.5 tpy limit required in SC I.2. The highest aggregate 12-month rolling HAP emission recorded was 7.99 tpy in March 2023.

Conclusion

Based on the observations made during the inspection, and an analysis of the requested records, the facility is in compliance with the conditions and requirements of PTI No. 143-04D.

NAME Owen Pierce DATE 8/15/23 SUPERVISOR K. Kelly