

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

N112229013

FACILITY: ACT Test Panels LLC		SRN / ID: N1122
LOCATION: 273 Industrial Dr, HILLSDALE		DISTRICT: Jackson
CITY: HILLSDALE		COUNTY: HILLSDALE
CONTACT: Mike Janes, Quality Manager/Environmental Coordinator		ACTIVITY DATE: 04/01/2015
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Mike Janes, Quality Manager/Environmental Coordinator
Telephone: 517-439-1485 ext. 645
Email: mike.janes@acttestpanels.com

I arrived at the facility and met with Mike Janes and explained the reason for my visit. I gave him a copy of the Environmental Inspections pamphlet and went over the inspection process with him. This facility makes panels out of steel and aluminum with the largest panel 4 by 12 inches in size. They will paint these panels according to their customer's specifications so that they can be tested under various conditions.

SPRAYPAINT BOOTH #1

Spray paint Booth #1 was being used during the inspection. From March 2014 through February 2015, the company emitted 0.4704 tons of VOC (based on a 12 month rolling average), well below Special Condition (S.C.) 13's limit of 9.34 tons. I asked them to determine what their pounds per hour for the month in that same time period that had the highest VOC emission, which was December 2014. They emitted 87.24 pounds of VOC during 160 hours of operation, which comes out to 0.545 lb/hour, well below S.C. 13's limit of 4.7 lb/hr. There were no visible emissions (S.C. 14) from the stack, which appeared to be within the dimensions stated in S.C. 16 and the exhaust filters were in place and operating properly (S.C. 15).

SPRAYPAINT BOOTH #2

Spray Booth #2 was in use during the inspection. From March 2014 through February 2015, the company emitted 0.4654 tons of VOC (based on a 12 month rolling average), well below S.C. 17's limit of 5.4 tons. I asked them to determine what their pounds per hour for the month in that same time period that had the highest VOC emission, which was December 2014. They emitted 87.39 pounds of VOC during 160 hours of operation, which comes out to 0.546 lb/hour, well below S.C. 17's limit of 2.72 lb/hr. There were no visible emissions (S.C. 18) from the stack, which appeared to be within the dimensions stated in S.C. 20 and the exhaust filters were in place and operating properly (S.C. 19).

According to Mr. Janes, Paint Booth #3 is rarely used. He reported to me that they emitted 65.11 lb of VOC during the time period of March 2014 through February 2015. The filters were installed properly during the inspection, although it was not being used. This booth continues to meet the Rule 287(c) exemption.

E-COAT LINE

The E-Coat line was operating during the inspection. This line has 3 dip tanks and 3 bake ovens with each having its own stack. During the inspection I did not observe any visible emissions from the 3 stacks (SC Nos. 22, 24, 25 and 26). From March 2014 through February 2015, this line emitted 0.463 tons of VOC (based on a 12 month rolling average), well below S.C. 21's limit of 6.6 tons. I asked them to determine what their pounds per hour for the month in that same time period that had the highest VOC emission, which was October 2014. They emitted 125.9 pounds of VOC during 230 hours of operation, which comes out to 0.547 lb/hour, well below S.C. 21's limit of 3.3 lb/hr.

FOR ALL SURFACE COATING PROCESSES

Per S.C. 27, they are keeping monthly records which identify the surface coating process and the coating used, the VOC content in lb/gal as received and as applied, the VOC content in lb/gal for each reducer, catalyst, solvent, all other VOC containing material used. They also are keeping records of clean up solvent usage and disposal records and a record of purchase orders and invoices. He also sent to me the monthly calculations of each HAP emission rate (in tons/mo) by process, aggregate HAP emissions (in tons/mo) for all processes, and the 12 month rolling average HAP emission rate in tons/yr. He also included the monthly VOC emission rates in tons/mo and the 12 month rolling average in tons/yr by process (see attached). Their current 12 month rolling average (in tons/yr) HAP emissions total is 1.167 tons, which is well below their limit of 9 tons/yr for individual

HAPs and 22.5 tons/yr for any combination of HAPs (S.C. 28).

PHOSPHATE LINE

They told me that they run this line approximately 2 to 3 day per month. They are permitted to use hexavalent chromium on this line and currently still use it. From March 2014 through February 2015, they added 357 lb of hexavalent chromium sealer to the sealer bath. There were no visible emissions (S.C. 30) from the stack, which appeared to be within the dimensions stated in S.C. 31.

AGET OIL RECOVERY PROCESS

This process is no longer at this facility.

COLD CLEANER

This unit is no longer at this facility.

PHOSPHATE PROGRAMAT HOIST LINE

This line was originally permitted to use hexavalent chromium and the conditions for this line were only for the use of hexavalent chromium. They have ceased using hexavalent chromium on this line.

SLUDGE DRYER WITH VENTURI SCRUBBER

This unit is no longer at this facility.

SMALL PRODUCTION POWDER COAT PROCESS

This process is now exempt under Rule 287(d). They are keeping monthly records of the coating usage for this process (S.C. 54). There were no visible emissions (S.C. 53) from the stack and have a two stage cartridge filter per S.C. 55. They are disposing the collected powder in accordance with S.C. 56. Their current process meets the requirements of this exemption, which also meets the requirements of S.C. 52 through 56.

Based on the information gathered during my inspection and their MAERS submittal, I determined that they are in compliance with their permit and AQD rules.

NAME

Brian Bailey

DATE

4/28/15

SUPERVISOR

[Signature]