

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

N112250430

FACILITY: ACT Test Panels LLC		SRN / ID: N1122
LOCATION: 273 Industrial Dr, HILLSDALE		DISTRICT: Jackson
CITY: HILLSDALE		COUNTY: HILLSDALE
CONTACT: Jim Bielak , President		ACTIVITY DATE: 09/10/2019
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced targeted inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Jim Bielak, President  
Telephone: 517-439-1485 ext. 647  
Email: jim.bielak@acttestpanels.com

**PURPOSE**

I arrived at the facility for an unannounced inspection and met with Jim Bielak and Burt Johns, Operations Manager to determine compliance with Permit to Install (PTI) 570-95 and 60-16.

**Facility Description**

This facility makes test panels out of steel ranging from 2" x 3.5" to 12" x 18" in size and aluminum ranging from 2" x 3" to 19" x 36" in size. They will coat these panels according to their customer's specifications so that they can be tested under various conditions.

**COMPLIANCE DETERMINATION****Spraypaint Booth #1**

Spray paint Booth #1 was being used during the inspection. From January 2018 through December 2018, the company emitted 5,546 lbs. (2.77 tons) of VOC, well below Special Condition (S.C.) 13's limit of 9.34 tons. They also told me that they operated this booth for 2,259 hours last year. I determined their pounds per hour for that same time period to be 2.45 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 January 2018 through December 2018, the company emitted 4374.55 lbs. (2.19 tons) of VOC, well below S.C. 17's limit of 5.4 tons. They also told me that they operated this booth for 2,259 hours last year. I determined their pounds per hour for that same time period to be 1.94 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).

They have a third paint booth (Paint Booth #3), which is rarely used. They reported in MAERS that they emitted 552.99 lbs. (0.28 tons) of VOC during the time period of January 2018 through December 2018. 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). The paint that is used in the dip tanks are water-based and they use electricity to coat the panels. The tanks are not very big (~10-12 feet long, ~4 feet high, and ~2-3 feet wide) and the racks with the panels are loaded into each tank by hand. Once they are coated, then are put into one of the ovens. The tops of the tanks were open, and I could not smell any VOCs coming from any of them.

**For All Surface Coating Processes**

They have been doing their annual calculations, but they have not been doing the monthly calculations as required by this section. We discussed what they needed to do to for these monthly calculations. They have all the information to do the annual calculations, which they use to complete their MAERS submittal (see attached), they just need to do it on a monthly basis.

Phosphate Line

They are permitted to use hexavalent chromium on this line and currently still use it. At the time of the inspection, the parts that they were running on this line were not being coated with the hexavalent chromium. There were no visible emissions (S.C. 30) from the stack, which appeared to be within the dimensions stated in S.C. 31.

Agel 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(2)(d). This process was not operating at the time of the inspection. This process has 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.

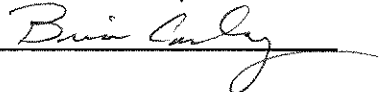
EUPHOSLINE2

This line is prohibited from using any chromium containing products (SC II.1), which they said that they were complying with. They have a database that is available to view of all the material safety data sheets of the materials used for the entire facility. This meets the requirements in SC VI.1.

COMPLIANCE DETERMINATION

They have done the annual calculations, but they need to do the monthly calculations as required in PTI No. 570-95. They have the information, but they need to compile it according to the requirements in the permit. They have already sent me on how they will rectify the recordkeeping issue (see attached email). This facility is a minor source of emissions, which could be exempt per Rule 287(2)(c) once they get their monthly record keeping set up and maintained and eliminate the use of the chromium compounds from their process. 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

DATE 10/3/19

SUPERVISOR

