

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

N158157182

FACILITY: Tribar Technologies Inc. (Plant 1)		SRN / ID: N1581
LOCATION: 30517 ANDERSEN COURT, WIXOM		DISTRICT: Warren
CITY: WIXOM		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 01/25/2021
STAFF: Joe Forth	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site Inspection with records collected electronically.		
RESOLVED COMPLAINTS:		

On January 25, 2021, AQD Staff Joseph Forth conducted a schedule inspection of Tribar Plant 1 located at 30517 Anderson Court, Wixom, MI. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and Permit to Install (PTI) No. 274-98A.

Tribar is an automotive parts coating company. Plant 1 focuses on spray applied coatings to plastic parts. The equipment at the facility is permitted as FG-COATLINE. FG-COATLINE consists of EU-MONORAIL which has two monorail spray booths controlled by a waterwash system and a monorail air cure oven. Also included is EU-BATCHBOOTH, which consists of four batch booths controlled by dry filters changed as needed or at least once a week. EU-BATCHBOOTH also contains two cure ovens. The facility has 3 cold cleaners.

I arrived at the facility and was met by Mr. Ed Barriager and Mr. Ryan O'Keefe, environmental staff for Tribar. I provided my credentials and stated the purpose of the inspection. Mr. Barriager and Mr. O'Keefe showed me the permitted equipment at the facility. I was also shown the cold cleaners which all had properly affixed lids with AQD operation instructions posted clearly. The cold cleaners appear to be exempt from permitting per Rule 336.1281(2)(h) as all are listed at 10 or less square feet of air/vapor interface. The facility appears to be in compliance with the requirements of Rule 707 Plant 1 is also an Opt-Out facility for HAPs.

Records were collected digitally and can be located in: S:\Air Quality Division\STAFF\Joe Forth\N1581 Tribar Plant 1 FY21 Inspection

Emission Limits – (Emission records provided January 27, 2021. Emissions provided were for the 2020 calendar year as January calculations were not yet completed at time of inspection/request)

- 1. Individual HAP emission limit for FG-COATLINE of 9.0 tons per year. The highest individual HAP emission reported was Xylol at 1.38 tons for the 12-month period ending on December 31, 2020. The permittee wasn't properly calculating 12-month rolling HAP totals. There was a simple calculation error and because the permittee was within the limit after the correction this will not be included in the violation notice.**

- 2. Aggregate HAP emission limit for FG-COATLINE of 22.5 tons per year. Records provided indicate the HAP emissions for 2020 totaled at 3.633 tons.**

- 3. Hourly VOC emission limit for FG-COATLINE of 30.0 pounds per hour. The facility was not properly keeping hours of operation for each individual coating booth so the hourly emission limit could not be properly verified.**

- 4. VOC emission limit for FG-COATLINE of 49.0 tons per year. For 2020, the total reported VOC emissions for FG-COATLINE were 24.017 tons. The 12-month rolling total of VOCs ending in February 2021 was 24.543 tons.**

- 5. VOC emission limit for each individual spray booth of FG-COATLINE of 29.5 tons per year. The highest individual spray booth emission rate reported for 2020 was the monorail at 21.62 tons in the 12-month rolling time period ending in February 2021.**

(Upon my first review of the records provided I discovered some exceedances of the per gallon VOC limit for some of the coatings, I questioned Mr. Barriager about these exceedances, and he claimed that the air-dried prime calculations were exceeding because the reducer added was not factored in. Therefore, some per gallon limits needed correction so some were collected after January 27, 2021.)

- 6. Automotive Air-dried Prime - exterior plastic parts coating (black/red) VOC limit of 5.52 pounds of VOC per gallon (minus water), as applied (calendar day- volume weighted average). Despite the correction to include reducer the emission rate for this coating type was exceeded several times. This is a violation of this permit condition.**

- 7. Automotive Air-dried Basecoat – interior/exterior plastic parts coating (black/red) VOC limit of 5.75 pounds of VOC per gallon (minus water), as applied (calendar day- volume weighted average). The facility exceeded this emission limit on 2-15-21. This is a violation of the permit condition.**

8. **Automotive Air-dried Basecoat – interior/exterior plastic parts coating (non-black/red) VOC limit of 5.0 pounds of VOC per gallon (minus water), as applied (calendar day- volume weighted average). The facility appears to be in compliance with this emission limit. The highest observed emission rate was on 1-12-21 with an average emission rate of 4.970 lbs VOC/gal.**

9. **Automotive Air-dried Clearcoat – interior/exterior plastic parts coating VOC limit of 4.5 pounds of VOC per gallon (minus water), as applied (calendar day- volume weighted average). The facility appears to be in compliance with this emission limit. The highest observed emission rate was on 1-7-21 with an average emission rate of 4.315 lbs VOC/gal.**

10. **Non-automotive Prime – plastic parts coating VOC limit of 6.55 pounds per gallon (minus water), as applied. No non-automotive coatings were used in 2020, and none so far in 2021.**

11. **Non-automotive Basecoat – plastic parts coating VOC limit of 5.95 pounds per gallon (minus water), as applied. No non-automotive coatings were used in 2020, and none so far in 2021.**

Material Usage Limits

12. **The applicant shall not use more than 36.0 pounds of Diethylene Glycol Monobutyl Ether (CAS No. 112-34-5) per 24-hour calendar day in FG-COATLINE. The facility did not use any Diethylene Glycol Monobutyl Ether during 2020, and none so far in 2021. The facility has not recently utilized the material in it's manufacturing process according to Mr. Barriager.**

Process/Operational Limits

13. **The collection and disposal of waste coatings, catalysts, reducers, and solvents shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. During the inspection, all waste materials appeared to be stored in closed top receptacles while they await disposal.**

14. **The oven portions of FG-COATLINE shall not cure parts at temperatures greater than 194°F when air-dried automotive coatings are being cured. The air**

cured section of FG-COATLINE does not exceed 194 °F. Temperature records can be located in the spreadsheet titled “2021 Daily Summary for 30517”. At the time of inspection the air cure oven was at 186 °F.

Equipment

15. The applicant shall not operate any spray booth portion of FG-COATLINE unless its respective waterwash systems or dry panel filters are in place and operating properly. Mr. Barriager and Mr. O’Keefe showed me the coating booths so that I could view the waterwash and dry filter controls. All coating booths appeared to be properly equipped with their corresponding controls. Mr. Barriager told me that filters are replaced as needed, but usually at least once a week.

16. The applicant shall equip and maintain the spray booth portions of FG-COATLINE with high volume low pressure (HVLP) spray guns or equivalent technology with comparable transfer efficiency. Mr. Barriager showed me the HVLP spray applicators used in FG-COATLINE.

Testing

17. The VOC content of any coating, catalyst, reducer, and solvent, as applied and as received, shall be determined using federal Reference Test Method 24 or other EPA approved reference method. Upon prior approval of the District Supervisor, Air Quality Division, VOC content may alternatively be determined from manufacturer's formulation data. The facility received permission to use manufacturer’s data to calculate VOC emissions.

Monitoring

18. The applicant shall monitor and record the temperature in the cure oven portions of FG-COATLINE on a continuous basis in a manner and with instrumentation acceptable to the District Supervisor, Air Quality Division. In addition, the applicant shall keep a record of the type of parts being cured in

each oven. Temperature and parts processed records provided. Temperature at time of inspection was 186 °F. These records confirm compliance with the condition 14 temperature requirements.

Recordkeeping/Reporting/Notification

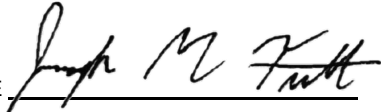
All required records for special conditions 19-21 were provided.

Stack/Vent Conditions

22. The exhaust gases from FG-COATLINE shall be discharged unobstructed vertically upwards to the ambient air from stacks. The exhaust stacks of FG-COATLINE appeared to be discharging unobstructed vertically upwards.

Conclusion

The permittee appears to be in violation of PTI No. 274-98A Special Conditions 3, 6 and 7 and will be issued a violation notice. I have been in contact with the facility regarding the compliance issues and the permittee is aware that a violation notice will be issued.

NAME 

DATE 6/7/21

SUPERVISOR 