

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

N158164248

<b>FACILITY:</b> Tribar Technologies Inc. (Plant 1)		<b>SRN / ID:</b> N1581
<b>LOCATION:</b> 30517 ANDERSEN COURT, WIXOM		<b>DISTRICT:</b> Warren
<b>CITY:</b> WIXOM		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Ryan O'Keefe , Environmental		<b>ACTIVITY DATE:</b> 07/21/2022
<b>STAFF:</b> Mark Dziadosz	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> FY 2022 Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On Thursday, July 21, 2022, I, Michigan Department of Environment Great Lakes and Energy-Air Quality Division staff Mark Dziadosz, conducted an announced scheduled inspection of Tribar Plant 1, Inc (N1581), located at 30517 Andersen Court Wixom, Michigan. The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Permit to Install (PTI) No. 274-98A.

I arrived at the Tribar Plant 3 at 9:50 AM and met with Ryan O'Keefe, Environmental. During the pre-inspection meeting, we discussed Plant 1's PTI (No. 274-98A) and the facility's operations and products. 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 EUBATCHBOOTH, 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. According to Ryan, the environmental contact for this facility had left in July 2021 and the required records have not been kept since. The facility hired a consultant to help get the recordkeeping in order and bring the facility into compliance. After discussion, we traveled to Plant 1 for inspection. The cold cleaners 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.

### FGFACILITY

SC I.1a and I.1b limits individual HAP emissions to 9 tons per year and aggregate HAP emission to 22.5 tons per year, respectively. No HAP emission calculations were available during inspection. The facility has not properly kept paint records since July 2021, so the hourly emission limit could not be properly verified.

**SC 3: Hourly VOC emission limit for FG-COATLINE of 30.0 pounds per hour. The facility has not properly kept records for each individual coating booth since July 2021, so the hourly emission limit could not be properly verified.**

**SC 4: VOC emission limit for FG-COATLINE of 49.0 tons per year. The facility has not properly kept records for each individual coating booth since July 2021, so the ton per year emission limit could not be properly verified.**

**SC 5: VOC emission limit for each individual spray booth of FG-COATLINE of 29.5 tons per year. The facility has not properly kept records for each individual coating booth since July 2021, so the ton per year emission limit could not be properly verified.**

**SC 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). The facility has not properly kept records since July 2021, so the VOC per gallon emission limit could not be properly verified.**

**SC 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 has not properly kept records since July 2021, so the VOC per gallon emission limit could not be properly verified.**

**SC 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 has not properly kept records since July 2021, so the VOC per gallon emission limit could not be properly verified.**

**SC 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 has not properly kept records since July 2021, so the VOC per gallon emission limit could not be properly verified.**

**SC 10: Non-automotive Prime – plastic parts coating VOC limit of 6.55 pounds per gallon (minus water), as applied. The facility has not properly kept records since July 2021, so the VOC per gallon emission limit could not be properly verified. In previous inspection reports it is noted the facility only uses automotive coatings.**

**SC 11: Non-automotive Basecoat – plastic parts coating VOC limit of 5.95 pounds per gallon (minus water), as applied. The facility has not properly kept records since July 2021, so the VOC per gallon emission limit could**

not be properly verified. In previous inspection reports it is noted the facility only uses automotive coatings.

### Material Usage Limits

**SC 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 FGCOATLINE. The facility has not properly kept records since July 2021, so the Diethylene Glycol Monobutyl Ether emission limit could not be properly verified. In a previous inspection report, it is noted Diethylene Glycol Monobutyl was not used in 2020 through January 2021.

### Process/Operational Limits

**SC 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, there were 3 open small containers (less than 5 gallons) containing solvent in the paint mixing room without parts. These should be covered when not in use. A VN was issued for this. Open solvent containers without parts were also observed in the batch room. Waste materials appeared to be stored in closed top receptacles while they await disposal by ERG.

**SC 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. Temperature records were requested but as of 8/16/2022, have not been received. During inspection, the set point of the oven temperature was 180°F, however, the oven appeared to be exceeding the 194° limit. Records were requested of the oven temperature. A violation may be issued based on the records received.

**SC 15:** The applicant shall not operate any spray booth portion of FGCOATLINE unless its respective waterwash systems or dry panel filters are in place and operating properly. 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. Darryl told me that filters are replaced as needed, but usually at least once a week.

**SC 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. Ryan showed me the HVLP spray applicators used in FG-COATLINE.

### Testing

**SC 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**

**SC 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 records were requested and as of 8/16/2022, have not yet been received. According to Ryan, automotive parts are cured in the oven although no records of this were provided.**

### **Recordkeeping/Reporting/Notification**

**SC 19: The applicant shall maintain a current listing from the manufacturer, of the chemical composition of each coating, catalyst, reducer, cleanup solvent, etc., including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. The SDS sheets were requested during inspection. As of 8/23/2022, no records have been received.**

**SC 20: The applicant shall keep a record for each calendar month of the following information for the stationary source:**

**a) For each HAPs-containing material used at the facility:**

- 1. The amount used in gallons of each material.**
- 2. The HAP content, in pounds per gallon, of each material.**

**b) Individual and aggregate HAP emission calculations, determining the monthly emission rate in tons per month and the 12-month rolling average HAP emission rate at the end of each calendar month in tons per year.**

**The facility has not properly kept records since July 2021, so the HAP emission calculations have not been completed and compliance cannot be verified.**

**SC 21: The applicant shall keep a record for each calendar month of the following information for FG-COATLINE:**

**a) Daily hours of operation for each spray booth.**

**b) Daily for each coating, catalyst, reducer, and cleanup/purge solvent used:**

1. The coating, reducer, cleanup, and purge solvent identification and coating category.
2. The amount used in gallons (with water).
3. The VOC content in pounds per gallon (minus water and with water), as received and as applied.
4. For each calendar day, a calculation of the volume-weighted average VOC content in pounds per gallon (minus water), as applied, for the applicable coating categories.
5. The Diethylene Glycol Monobutyl Ether (CAS No. 112-34-5) content in pounds per gallon (with water) as received and as applied.
6. The amount used in pounds of Diethylene Glycol Monobutyl Ether (CAS No. 112-34-5) on a 24-hour calendar day basis.

**c) Gallons used of the low use coatings on a monthly, and a 12-month rolling time period for FG-COATLINE**

**d) Calculate the pounds VOC per hour based on a daily average for FG-COATLINE.**

The facility has not properly kept records since July 2021, so the required calculations have not been completed.

As of 8/23/2022, the facility has not submitted the 2021 MAERS report. Based on the information gathered during the inspection, Tribar Plant 1 Company, Inc. appears to be out of compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and PTI No. 274 -98A. A violation notice was issued for the recordkeeping and open solvent containers on 8/9/2022.

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NAME

August 24, 2022  
DATE

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SUPERVISOR