

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

N158168454

FACILITY: Tribar Technologies Inc. (Plant 1)		SRN / ID: N1581
LOCATION: 30517 ANDERSEN COURT, WIXOM		DISTRICT: Warren
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Alexandria Muench , Environmental Manager		ACTIVITY DATE: 07/12/2023
STAFF: Mark Dziadosz	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 23 inspection		
RESOLVED COMPLAINTS:		

On Wednesday, July 12, 2023, I, Michigan Department of Environment Great Lakes and Energy-Air Quality Division staff Mark Dziadosz along with Marie Reid, 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.

We arrived at the Tribar Plant 1 at 8:30 AM and met with Alex Muench, Environmental Manager. Also present was Keith Dromowicz-Environmental Health & Safety Manager, Scott Venman of Barr Engineering, Tim Wakefield -Operations Manager, Ron Beatty-Maintenance Supervisor, and Muath Aldhali-Maintenance Supervisor. On 6/26/23, records for the time-period of 8/1/22 to 5/31/23 were requested and received on 7/7/23. Numerous errors were found in the recordkeeping and Tribar was given until 7/19/23 to provide updated records. The updated records were received 7/17/23. A VN will be issued for the errors in the recordkeeping. During the pre-inspection meeting, we discussed Plant 1's PTI (No. 274-98A), the electronic records, and the facility's operations and products. We were then taken on a tour of the facility.

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 EUBATCHBOOTHs, which consists of four batch booths controlled by dry filters changed once a day. As of now, booths 1 and 4 are the only booths used. EU-BATCHBOOTHs also contains two cure ovens. The facility has 2 cold cleaners (mask washers). The facility also has an aqueous based parts washer with an associated dry off oven. This process is exempt from the requirement for a PTI by 336.1281(2)(h)

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 cleaners appear to be in compliance with the requirements of Rule 707.

Compliance

On September 9, 2021, as the result of inspection on January 25, 2021, the facility received a Violation Notice (VN) for failure to maintain records of hours of operation of the coating booths as well as exceeding the VOC lb/gallon limit for certain types of paints. During the inspection on 7/21/2022 it was discovered the environmental contact had left the facility in July 2021 and the paint records had not been kept since then and there was no way to show compliance with the emission limits in PTI #274-98A. At this time, Barr Engineering was hired to help bring the facility into compliance. A VN was issued on 8/9/2022 with a response date of August 30, 2022. A 2nd VN was issued on 9/1/2022 after not receiving a response to the 8/9/2022 VN. On October 24th, 2022, another VN was issued after reviewing oven temperatures provided by the facility for failure to maintain the cure oven temperature of FG-COATLINE at 194 degrees or lower when air-dried automotive coatings are being cured. However, it was discovered the temperature records received were for the Dry off Oven for the parts washer and not for the cure oven. A VN was issued on 4/18/23 to Tribar Plant 1 for non-submittal of the RY 2021 MAERS report. On May 1, 2023, the RY2021 MAERS reports for Plant 1 was received. Any provided documents can be found in: S:\Air Quality Division\Staff\Mark Dziadosz\N1581 Tribar Plant 1 FY23 Inspection or the facility plant file.

FGFACILITY

SC I.1a and I.1b limits individual HAP emissions to 9 tons per 12-month rolling average and aggregate HAP emission to 22.5 tons per 12-month rolling average, respectively. In the time-period reviewed, the highest 12-month rolling average aggregate HAP emissions was 2 tons in May 2023.

SC 3: Hourly VOC emission limit for FG-COATLINE of 30.0 pounds per hour. In the time-period reviewed, the highest VOC pounds per hour emissions was on October 31, 2022, at 26.96.

SC 4: VOC emission limit for FG-COATLINE of 49.0 tons per 12-month rolling average. In the time-period reviewed, the highest 12-month rolling average VOC emissions was 30.5 tons in December 2022.

SC 5: VOC emission limit for each individual spray booth of FG-COATLINE of 29.5 tons per 12-month rolling average. In the time-period reviewed, the highest 12-month rolling average VOC emissions was 27.8 tons for the Monorail Booth in December 2022.

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). However, if the total paint usage per 12-month time period is 55-gallons or less, the coatings are exempt from the VOC content limits. In the time-period reviewed, the limit was exceeded six times. According to Tim, most painting operations have been transferred to Tribar Plant 3 and the amount of painting at Plant 1 will be reduced. A VN will be issued for the exceedances.

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). In the time-period reviewed, the limit was exceeded eleven times. According to Tim, most painting operations have been transferred to Tribar Plant 3 and the amount of painting at Plant 1 will be reduced. A VN will be issued for the exceedances.

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). In the time-period reviewed, the limit was exceeded the entire time. According to Tim, most painting operations have been transferred to Tribar Plant 3 and the amount of painting at Plant 1 will be reduced. A VN will be issued for the exceedances.

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). However, if the total paint usage per 12-month time period is 55-gallons or less (sum for all coating categories), the coatings are exempt from the VOC content limits. In the time-period reviewed, the limit was exceeded four times. According to Tim, most painting operations have been transferred to Tribar Plant 3 and the amount of painting at Plant 1 will be reduced. A VN will be issued for the exceedances.

SC 10: Non-automotive Prime – plastic parts coating VOC limit of 6.55 pounds per gallon (minus water), as applied. Per Alex, the facility only uses automotive coatings. In the time-period reviewed, the records showed no usage of Non-automotive Prime.

SC 11: Non-automotive Basecoat – plastic parts coating VOC limit of 5.95 pounds per gallon (minus water), as applied. Per Alex, the facility only uses automotive coatings. In the time-period reviewed, the records showed no usage of Non-automotive Basecoat.

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. Per Alex and Tim, Diethylene Glycol Monobutyl Ether is no longer used. In the time-period reviewed, the records showed no current paints contain Diethylene Glycol Monobutyl Ether.

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. 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 reviewed onsite. In the time-period reviewed, the limit was not exceeded. However, the pen recorder for the cure oven data logger has been broken since 6/20/23. According to Tim, until the recorder is fixed, the temperature in the oven is being manually recorded four times per day. Also, a “data paq” is being run through the oven once per week to check temperatures. The “data paq” is calibrated once per year. According to Tim, if the temperatures in the cure oven are too high, the parts will shrink.

Equipment

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. Alex showed me the coating booths and associated waterwash (Monorail) and dry filter controls (Monorail and batch booths). According to Tim, batch booths 2 & 3 were not currently being used. All coating booths appeared to be properly equipped with their corresponding controls. Muath indicated in the Monorail, filters are replaced as needed, and are checked once a week. Filters are replaced daily in the batch booths. According to Tim, most painting operations have been transferred to Tribar Plant 3 and the amount of painting at Plant 1 will be reduced.

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. Tim 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. There is not a record in the file for using manufacturer's formulation data. I notified the facility if they intend to use manufacturer's data, to put a request in to the district supervisor. I asked the facility to test one coating per year using Method 24 with the first coating tested before the end of December 2023.

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. The pen recorder for the cure oven data logger has been broken since 6/20/23. According to Tim, until the recorder is fixed, the temperature in the oven is being manually recorded four times per day. Also, a "data paq" is being run through the oven once per week to check temperatures. The "data paq" is calibrated once per year. According to Tim, if the temperatures in the cure oven are too high, the parts will shrink. A VN will be issued for not continuously monitoring the temperature. According to Alex, only automotive parts are processed by Tribar and are cured in the oven.

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 facility provided SDS sheets for each paint in use at the facility.

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 is keeping the required records.

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 is keeping the required records.

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 will be issued for the violations.

NAME

DATE August 3, 2023 SUPERVISOR