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

N158173600

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:** 07/29/2024
STAFF: Mark Dziadosz	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: FY 2024 Inspection		
RESOLVED COMPLAINTS:		

On Monday, July 29, 2024, I, Michigan Department of Environment Great Lakes and Energy-Air Quality Division staff Mark Dziadosz along with Attorney General (AG) Elizabeth Morrisseau, 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.

As of December 2023, Tribar Plant 1 is idled. Operations have been transferred to Plant 3. Once the facility removes the equipment, the facility will request PTI #274-98A be voided. Tribar plans to be out of the building by the end of October 2024.

I 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 and Teresa Kinder of Barr Engineering, and Kurt Kissling-attorney for Tribar. We held a brief pre-inspection meeting, and we were then taken on a walkthrough of the facility. During the walkthrough, most of the equipment was in the process of being dismantled. The facility appeared to not have operated in a while.

On 6/24/24, records for the time-period of 8/1/23 to the end of operations (12/23) were requested and received on 7/19/24.

Tribar is an automotive parts coating company. Plant 1 focused on spray applicated coatings to plastic parts. The equipment at the facility is permitted as FG-COATLINE. FG-COATLINE consisted of EU-MONORAIL which had two monorail spray booths controlled by a waterwash system and a monorail air cure oven. Also included is EUBATCHBOOTHS, which consisted of four batch booths controlled by dry filters changed once a day. Booths 1 and 4 were the only booths used. EU-BATCHBOOTHS also contained two cure ovens. The facility had 2 cold cleaners (mask washers). The facility also had an aqueous based parts washer with an associated dry off oven. This process was 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 appeared 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 appeared to be in compliance with the requirements of

Rule 707. At the time of inspection, the cold cleaners were empty.

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. During the 2023 inspection, numerous errors were found in the recordkeeping spreadsheets and Tribar was given until 7/19/23 to provide updated records. The updated records were received 7/17/23. On August 4, 2023, a VN was issued for not continuously monitoring the temperature in the cure oven portions of FG-COATLINE, exceeding numerous lb/gallon VOC limits, and providing recordkeeping that contained numerous errors during inspection. A response to the violation was received on August 25, 2024, and the issues were addressed. Any provided documents can be found in: S:\Air Quality Division\Staff\Mark Dziadosz\N1581 Tribar Plant 1 FY24 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 2.12 tons in August 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 June 17, 2023, at 15.82.

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 25.26 tons in August 2023.

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 23.61 tons for the Monorail Booth in August 2023.

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 records showed no usage of Automotive Air-dried Prime.

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 highest VOC content was 5.28 lb/gal on August 1, 2023.

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 records showed no usage of Automotive Air-dried Basecoat.

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 records showed no usage of Automotive Air-dried Clearcoat.

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, 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. During previous inspections, waste materials appeared to be stored in closed top receptacles while they awaited disposal by ERG or US Ecology. During inspection, there was not any waste materials onsite.

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 was not recording data from 6/20/23 to 10/2/23. According to Tribar, until the recorder was fixed, the temperature in the oven was being manually recorded four times per day. Also, a "data paq" was run through the oven once per week to check temperatures. The "data paq" is calibrated once per year. According to Tribar, if the temperatures in the cure oven are too high, the parts will shrink. Records of the monitored temperatures were maintained by Alex.

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. During previous inspections, Alex showed me the coating booths and associated waterwash (Monorail) and dry filter controls (Monorail and batch booths). According to Tribar, batch booths 2 & 3 were not used recently. During previous inspections, all coating booths appeared to be properly equipped with their corresponding controls. In the Monorail, filters were replaced as needed, and checked once a week. Filters were replaced daily in the batch booths.

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. During previous inspections, the facility 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 manufactures data, to put a request into 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. This did not occur, but with the facility being idled, this request is no longer valid.

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 was not recording data from 6/20/23 to 10/2/23. According to Tribar, until the recorder was fixed, the temperature in the oven was being manually recorded four times per day. Also, a "data paq" was run through the oven once per week to check temperatures. The "data paq" is calibrated once per year. According to Tribar, if the temperatures in the cure oven are too high, the parts will shrink. Records of the monitored temperatures were maintained by Alex. According to Alex, only automotive parts are processed by Tribar and were 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 facililty provided SDS sheets for each paint that had been in use at the facility. During inspection, there were no coatings onsite.

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 was 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 was keeping the required records.

Based on the information gathered during the inspection, Tribar Plant 1 Company, Inc. appears to be in 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 # 274-98A. As noted, the facility is idled with operations being transferred to Tribar Plant 3. PTI # 274-98A will be voided at the request of Tribar once equipment is removed from the facility.

NAME _____ DATE 09-17-2024 SUPERVISOR _____