

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

N172652706

<b>FACILITY:</b> Peter-Lacke USA		<b>SRN / ID:</b> N1726
<b>LOCATION:</b> 865 STEPHENSON HWY, TROY		<b>DISTRICT:</b> Southeast Michigan
<b>CITY:</b> TROY		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Mike Halinski , Director of Operations		<b>ACTIVITY DATE:</b> 03/06/2020
<b>STAFF:</b> Shamim Ahammod	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Conducted scheduled inspection.		
<b>RESOLVED COMPLAINTS:</b>		

On March 6, 2020, Michigan Department of Environment, Great Lakes and Energy (EGLE) - Air Quality Division (AQD) staff, I (Shamim Ahammod) conducted a scheduled inspection of Peter-Lacke (SRN#N1726) located at 865 Stephenson Highway, Troy, Michigan. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules and Permit to Install (PTI) No.104-15.

### **SOURCE DESCRIPTION**

Peter-Lacke operates a batch paint making process consisting of pre-dispersion portable mixing tanks, milling in horizontal peart mixers, let-down area mixing tanks, tinting, and filtration in cartridge-type or vibratory filtration. This facility makes automotive paints and glass paints.

### **INSPECTION**

I arrived at the facility at approximately 10:30 AM. I entered the customer service office and identified myself to a member of the office staff. This staff member directed me to Mr. Mike Halinski, Director of Operations, Peter-Lacke. I introduced myself to Mr. Halinski and stated the purpose of the inspection. During the pre-inspection meeting, we discussed PTI No. 104-15. Following the pre-inspection meeting, I walked through the facility with Mr. Halinski. He showed me the different areas such as lab, application, quality control, warehouse and manufacturing areas. While I was asking for the record keeping information, Mr. Halinski informed me that Mr. Bruce Bawkon, Director, Industrial Compliance Group recorded the data. After inspection day, Mr. Bawkon provided me all requested data via email.

### **REGULATORY ANALYSIS**

#### **EUPAINTPROD**

A batch paint making process consisting of pre-dispersion portable mixing tanks, milling in horizontal pearl mixers, let-down area mixing tanks, tinting, and filtration in cartridge-type or vibratory filtration.

#### **EMISSION LIMITS**

Per SC I.1 (Emission Limits) and SC VI.2, SC VI.3, SC VI.4 (Recordkeeping/monitoring), I reviewed the records of the VOC emissions from EUPAINTPROD for the time period of March 2019 through February 2020. Based on permittee's MS Excel spreadsheet records, I noted the VOC emissions from EUPAINTPROD were 15.42 tons which were below the permit limit of 20.4 tons for the 12-month rolling period as determined at the end of each calendar month (as of February 2020)

Per SC I.2 (Emission Limits) and SC VI.2, SC VI.5 (Recordkeeping/monitoring), from March 2019 through February 2020, calendar day basis, the Xylene (CAS No. 1330-20-7) emissions from EUPAINTPROD were below the permit limit of 25.8 lb/day.

**MATERIAL LIMITS**

Per SC II.1 (material limits), from March 2019 through February 2020, a 12-month rolling period, the Solvent-based and hydro-based industrial and automotive coatings emissions from EUPAINTPROD were 167,356 gallons which were below the permit limit of 200,000 gal/year.

**PROCESS/OPERATIONAL RESTRICTIONS**

Per SC III.1(process/operational restrictions), at the time of inspection, I observed the permittee captures all waste materials and all store them in closed containers.

**MONITORING/RECORDKEEPING**

Per SC VI.2 (monitoring/recordkeeping), the permittee provided current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component.

Per SC VI.3 (monitoring/recordkeeping), the permittee keeps the record of VOC emission from EUPAINTPROD in an MS Excel sheet. The VOC emission limit has been verified and explained in emission limit section (SC I.1, and SC I.2) and material limit (SC II.1). The permittee kept the records required in SC VI.4.a-d (recordkeeping and monitoring) on an MS Excel sheet. I reviewed the excel sheet and found the permittee satisfies the SC VI.4.a-d (recordkeeping and monitoring). The emission limit and material limit of VOC from EUPAINTPROD have been explained in emission limit (SC I.1, and SC I.2) and material limit (SC II.1) section.

As required in SC VI.5 a through c (Monitoring and recordkeeping), the permittee kept the records of Xylene (CAS No. 1330-20-7) emissions from EUPAINTPROD. As explained in SC I.2 (emission limit), from March 2019 through February 2020, calendar day basis, the Xylene (CAS No. 1330-20-7) emissions from EUPAINTPROD were below the permit limit of 25.8 lb/day

**STACK/VENT RESTRICTIONS**

Per SC VIII.1 (stack/vent restrictions), at the time of inspection I observed the exhaust gases from EUPAINTPROD were directly discharged into the plant.

**FGFACILITY****EMISSION LIMITS**

Per SC I.1(Emission Limits) and SC VI.2 (Recorkeeping/monitoring), I reviewed the records of each individual HAP emissions from FGFACILITY for the time period of march 2019 through February 2020. Based on permittee's MS Excel spreadsheet records, I noted each individual HAP emission was less than the permit limit of 9 tons for the 12-month rolling period as determined at the end of each calendar month as of February 2020.

Per SC I.2 (Emission Limits) and SC VI.2 (Recorkeeping/monitoring), I reviewed the records of aggregate HAP emissions from FGFACILITY for the time period of March 2019 through February 2020. Based on permittee's MS Excel spreadsheet records, I noted the aggregate HAP emission was 2.66 tons for the 12-month rolling period as determined at the end of each calendar month (as of February 2020) which was less than the permit limit of 22.5 tons/year.

Per SC I.3 (Emission Limits) and SC VI.3 (Recorkeeping/monitoring), I reviewed the records of Cumene (CAS No. 98-82-8) emissions from FGFACILITY for the time period of March 2019 through February 2020. Based on permittee's MS Excel spreadsheet records, I noted Cumene (CAS No. 98-82-8) emission was 38.26 lb for the 12-month rolling period as determined at the end of each calendar month (as of February 2020) which was less than the permit limit of 471.3 lb/year.

Per SC I.4 (Emission Limits) and SC VI.3 (Recorkeeping/monitoring), I reviewed the records of Naphthalene (CAS No. 91-20-3) emissions from FGFACILITY for the time period of March 2019 through February 2020. Based on permittee's MS Excel spreadsheet records, I noted Naphthalene

(CAS No. 91-20-3) emission was 20.58 lb for the 12-month rolling period as determined at the end of each calendar month (as of February 2020) which was less than the permit limit of 377.1 lb/year.

Based on the on-site inspection, reviewing records and discussion with staff, Peter-Lacke is in compliance with the requirements of PTI No. 104-15.

NAME 

DATE July 22, 2020

SUPERVISOR 