

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

N209833298

FACILITY: H&P Technologies, Inc.		SRN / ID: N2098
LOCATION: 21251 RYAN RD, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Michael Detz , Service Manager		ACTIVITY DATE: 02/09/2016
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On February 9, 2016, I conducted a scheduled inspection of H&P Technologies, Inc. (H&P) located at 21251 Ryan Road, Warren, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of **N2098**. 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. 198-89.

I entered the facility and met with Mr. Michael R. Detz, Service Manager. I presented AQD photo I.D. and provided Mr. Detz with a copy of the Environmental Inspections: Rights and Responsibilities brochure. We began with an opening meeting in which I explained the inspection process. I also explained that the purpose of the inspection was to determine compliance with PTI 198-89. The last inspection of record occurred on February 17, 1989. Mr. Detz was not aware of the existing approved air use permit to install. I gave Mr. Detz a copy of the PTI and application.

We began the inspection by reviewing records. H&P did not maintain monthly records of the amount of paint and reducer used per special condition 16. Mr. Detz did provide purchase order summaries for calendar years 2014 and 2015. The summaries appeared to demonstrate compliance with special condition 14, which limits the maximum annual usage to 500 gallons per year. The purchase order summaries indicate that a total of 61 gallons were used in 2014 and 58 gallons were used in 2015. These values represent less than 15% of the permitted annual usage. Mr. Detz agreed to start monthly recordkeeping.

Mr. Detz escorted me on a facility inspection. I observed employees repairing and servicing hydraulic and pneumatic devices. I observed a hydraulic test stand, which appears to be exempt from R 336.1201 per R 336.1283(c).

I observed the spray booth. The particulate filters appeared to be well maintained. Filter retainers were installed over each filter. I discussed particulate filter options and the difficulty of maintaining the current particulate filter media. I also pointed out to Mr. Detz that the filter bank wall had damage to small areas that would allow particulates to bypass the particulate filters. Mr. Detz verbally committed to repairing the spray booth in a timely manner. At 1:58 p.m. on the same day of the inspection, I received an email with photos that show the paint spray booth had been repaired (hard copy attached).

The facility has four cold cleaners, which appeared to have an air/vapor interface of less than 10 square feet. The cold cleaners are maintained by Vesco. These cold cleaners appear to be exempt from R 336.1201 per R 336.1281(h).

The facility also has two dip cleaning tanks that use Nuvat Classic cleaner. A SDS was provided and I conducted internet searches to determine the vapor pressure of each material component to determine if this process is subject to R 336.1201. A review of the components appears to indicate that no VOC in the cleaning solution has a vapor pressure greater than 0.1 mmHg at standard conditions (see attached hard copy summary). Therefore, these two dip cleaning tanks appear to be exempt from R 336.1201 per R 336.1281(c).

None of the unpermitted activities I observed appear to be subject to air pollution control rules.

Per the current Michigan Air Pollution Control rules, the permittee may elect to void PTI 198-89 and operate the surface coating line (spray booth) per the R 336.1287(c) exemption from R 336.1201. If the permittee elects to operate per the R 336.1287(c) exemption then H&S Technologies may apply up to 200 gallons of surface coating, minus water, per month as long as monthly coating use records are maintained and properly maintained particulate filters are installed.

CONCLUSION

Even though H&P Technologies did not maintain monthly records of paint and reducer used in the paint spray booth, the permittee was able to demonstrate that the annual usage of 500 gallons was not exceeded and that actual annual VOC emissions were estimated to be less than 15% of the permitted limit and therefore appears to be in compliance with permitted emission limits. Its failure to maintain the permit required recordkeeping is observed in a subsequent inspection, a violation notice may be issued.



Image 1(DSCF4342.JPG) : Photo provided by H&P Technologies on February 9, 2016. Note the two dark rectangles located between the filter banks. These rectangles are patched areas to prevent particulates bypassing the filters.

NAME *Bob Elman*

DATE *2/12/16*

SUPERVISOR *CJE*