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

N231124380

FACILITY: TRANSTAR AUTOBODY TECHNOLOGIES		SRN / ID: N2311
LOCATION: 2040 HEISERMAN DR, BRIGHTON		DISTRICT: Lansing
CITY: BRIGHTON		COUNTY: LIVINGSTON
CONTACT: Jody Rauls, EHS Manager		ACTIVITY DATE: 02/25/2014
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

On 2/25/2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Transtar Autobody Technologies, Inc.

Environmental contact:

Mr. Jody Rauls, EHS Manager; 810-360-1627; [jrauls@tat-co.com](mailto:jrauls@tat-co.com)

Facility description:

This facility produces clear coats, primers, compounds, underbody coatings, glazes, and other products, for the automotive refinishing market.

Regulatory overview:

This facility is considered to be a minor source, because its potential to emit for Volatile Organic Compounds (VOCs) and the other criteria air pollutants (carbon monoxide, nitrogen oxides, sulfur dioxide, lead, and particulate matter smaller than 2.5 microns), is less than the major source threshold of 100 tons per year (TPY). The facility is regulated by PTI No. 226-09C. In the application for this PTI, the company indicated that their actual potential for VOCs was less than the 15 TPY VOC permit limit.

A small tank farm was installed at the plant around 2012, and was considered exempt under Rules 284(i) and 290. This is documented in the plant file, with a 10/9/2012 e-mail from AQD's Brad Myott, to the company.

Additionally, Transtar Autobody is considered to be a minor source of Hazardous Air Pollutants (HAPs), not having the potential to emit 10 TPY of any single HAP or 25 TPY of total HAPs combined. As a minor or area source of HAPs, it is potentially subject to 40 CFR Part 63, Subpart CCCCCC, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paints and Allied Products Manufacturing. However, according to their 2012 permit application for PTI No. 226-09C, none of the targeted HAPs (benzene, methylene chloride, and compounds of cadmium, chromium, and nickel) were listed in the composition data on their raw materials. Therefore, they do not appear to be subject to the NESHAP.

Emission units:

Emission unit	Emission unit description	Permit to Install or relevant exemption	Operating status
EU COATING MFG	"Manufacture of automotive coatings": includes four mixers, as well as smaller air mixing units, and equipment for filling containers with finished products	226-09C	Compliance
Tank farm	Outdoor storage tanks for raw materials	Rules 284(i), 290	Compliance
Maintenance/repair area	Metal machining processes	Rules 285(l)(vi)(A) and (B)	Compliance

Location:

The facility is located at the north end of a small industrial park. There are industries 400 feet to the west, 300 feet to the southwest, and about 250 feet to the south. There are also industries about 350 feet

to the east and southeast. There are residential properties roughly 300 feet to the north and northwest of the facility, with the houses set back about 200 feet further.

#### Recent history:

On 4/5/2012, PTI No. 226-09C was approved. This PTI revision was to allow for the removal of the Regenerative Thermal Oxidizer (RTO), which was a required control device under PTI No. 226-09B. The RTO was removed, according to Permit Engineer Terry Wright's notes, because the VOC emissions getting routed to the device were so low, that it would not be Best Available Control Technology (BACT) for VOCs. He indicated that, per engineering judgment, BACT was "no control for 15 TPY VOC."

#### Fee status:

This facility is not considered to be fee subject, because it is a minor source, and is not subject to a federal New Source Performance Standard, or a federal Maximum Achievable Control Technology (MACT) standard. It is not required to report air emissions annually, through the Michigan Air Emission Reporting System (MAERS), because its actual yearly emissions of VOC are much less than the 10 TPY VOC threshold above which facilities should report.

#### Arrival:

At 9:55 AM, I drove north on Euler Road, which is 100-200 feet east of the plant, to check for odors. For about 2 seconds, as I was directly east of the plant, I detected a solvent odor. It was distinct and definite (corresponding to a level 2 on the 0 to 5 odor scale used by AQD), but I did not feel it was particularly strong. I turned around, and briefly detected the same odor, while driving south. Weather conditions were 19 degrees F, sunny, and clear, with winds at 5-10 miles per hour out of the southwest. Downwind of the plant were other businesses, and I did not feel that the odors were causing a nuisance situation.

I parked west of the plant, and saw that there were no visible emissions from the the main exhaust stack, which formerly exhausted the RTO. I met with Mr. Jody Rauls, Environmental, Health and Safety (EHS) Manager. I provided Mr. Rauls with a copy of the DEQ brochure "Environmental Inspections: Rights and Responsibilities," in accordance with AQD policy. February is the busiest month of the year for Mr. Rauls, due to Tier II reporting and a Homeland Security audit/inspection, but he made time to take me through the plant today.

#### Inspection:

According to the permit application for PTI No. 226-09C, this factory "sources raw materials (solvents, resins, fillers, additives, etc.) in order to manufacture clear coats and primers, adhesives, sealants, compounds and polishes, and a wide range of other body shop products." Along with mixing the products, they fill individual containers with their products, in sizes ranging from single cans, up to large plastic totes.

We walked through the plant, which is divided into the mixing room, the filling room, the packaging area, and their warehouse area.

#### EUCOATINGMFG, PTI No. 226-09C:

The largest of their four mixers has a 2,000 gallon size tank, but the largest batch size they will make in it is 1,500 gallons. This is because the mixing action tends to make the mix rise up on the inside walls of the tank, and they do not wish for the tank to overflow. This also allows them room to add some additional material to a mix, if they need to make an adjustment. The company is therefore in compliance with Special Condition No. II. 1 in PTI No. 226-09C, which restricts batch size for EUCOATINGMFG to 2,000 gallons maximum.

Their main mixers are nos. 2 and 3, where most of their primers are made. Emissions from the four mixers are collected by hoses which are attached to ductwork on the ceiling. The emissions are then exhausted out the stack which once served the RTO.

They have 3 large clearcoat storage tanks, which are all agitated. Two are 2,000 gallons, while the remaining unit is 1,000 gallons.

We went through the filling room, where their products are dispensed into various sizes of metal or plastic containers. The transfer of materials can be accomplished by portable pumps, or by gravity feed. After products are transferred, the transfer lines are cleaned with solvents. The solvents are collected, and are reused, for cleaning tanks. They get several uses out of a given batch of cleaning solvent, before it is hauled offsite, as hazardous waste.

Mr. Rauls explained that when the RTO was used at the site here, there just were not enough VOCs in the process exhaust air routed to the RTO to allow for efficient operation. Most of the emissions coming from the RTO were from burning natural gas to keep the unit at the required minimum temperature. PTI No. 226-09C allowed for the removal of the RTO. Additionally, he explained there was an error in the wording of the previous permit, No. 226-09B, which was subsequently corrected in the "C" version.

Tank farm; Rules 284(i) and 290:

For the tank farm, they have been trying to determine why cross contamination appeared to show up in some of their storage tanks, from some of their other raw materials, in recent months. So far, the most likely source of the problem appears to be issues with the delivery lines of their supplier.

The tanks in their tank farm were installed as exempt, in 2012. The tanks which contain toluene, MIBK, xylene, and N-Butyl acetate are considered subject to Rule 284(i), while the tanks which contain acetone and reducers are subject to Rule 290.

Maintenance/repair area; Rules 285(I)(vi)(A) and (B):

They have a small maintenance shop, where there are some machines for metal working. These processes are used on a non-production basis, and exhaust into the general in-plant atmosphere, so they are exempt from the requirement to obtain a permit to install under Rule 285(I)(vi)(A) and (B).

Facility recordkeeping:

We reviewed facility recordkeeping for 2013, for the throughput and emissions of VOCs, acetone, and PCBTF. Mr. Rauls provided a photocopy of a 2013 spreadsheet (attached for reference). VOC emissions for the entire plant were 1.12 TPY for 2013.

The facility has a VOC emission limit of 15 TPY for products not containing PCBTF. In 2013, plantwide VOC emissions were 1.13 tons, well below the limit. Additionally, the plant has an acetone emission limit of 2.61 TPY. In 2013, plantwide acetone emissions were 0.35 tons, well below the limit.

Their PTI No. 226-09C sets limits for raw material throughput. EUCOATINGMFG is limited to 2,000 gallons per batch, and the facility is complying with this requirement. Mr. Rauls explained that they would not ever want to mix over, or even close to, 2,000 gallons of material in their largest (2,000 gallon) mixer, because the contents would spill over the sides, from the mixing action.

PTI No. 226-09C limits batches of low VOC primer containing parachlorobenzotrifluoride (PCBTF) to 100 per year. In 2013, Transtar made 65 batches. Additionally, the permit limits batches of low VOC clear formulation (clear coat) containing PCBTF to 100 per year. Mr. Rauls provided an estimate on the high side, that in 2013, they made roughly 70 batches of low VOC clear formulation, but suspected the actual number was considerably less. They keep records of each individual batch, as I was shown, but adding them up, one by one, would have taken some time away from the inspection.

The PTI limits annual throughput of VOC used in the production of products not containing PCBTF to 9,000,000 lbs. For 2013, their throughput of VOC was 2,257,491 lbs. Additionally, the permit restricts throughput of acetone used in the production of products not containing PCBTF to 1,800,000 lbs. For 2013, their throughput of acetone was 699,099 lbs. These values are below the permitted limits.

For the tank farm, Mr. Rauls will provide a copy of a calculation which a chemical engineer at the facility had done, prior to Mr. Rauls joining Transtar. This calculation demonstrated that, even under a worst case scenario, no individual tank at the tank farm would be able to emit more than the 1,000 lbs of emissions per month specified by the Rule 290 exemption.

I left the site at 1:10 PM. I could not see any visible emissions from the plant, as I left.

**Conclusion:**

The facility appeared clean, neat, and orderly, and I could not find any areas of concern. I could not identify any instances of noncompliance with PTI No. 226-09C, or the Air Pollution Control Rules. Facility staff were very knowledgeable and professional.

NAME

*[Handwritten Signature]*

DATE

*3/11/2014*

SUPERVISOR

*[Handwritten Signature]*