

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

N333340370

FACILITY: Blue Water Glass		SRN / ID: N3333
LOCATION: 2401 16TH ST, PORT HURON		DISTRICT: Southeast Michigan
CITY: PORT HURON		COUNTY: SAINT CLAIR
CONTACT: Charles Crandall		ACTIVITY DATE: 06/23/2017
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Friday, June 23, 2017, MDEQ-AQD Staff Sebastian Kallumkal conducted an unannounced annual inspection at GMA Cover Corporation (facility) located at 2401 16th Street, Port Huron, Michigan. The purpose of the inspection was to determine facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and Permit to Install (PTI) No. 92-07A.

I arrived the site around noon. Upon arriving at the site, I observed that the building was named "Blue Water Glass" (BWG). I entered the facility and explained to the receptionist about the intent of my visit. She told me that GMA Cover Corporation no longer operates at that location. I informed her even though previous facility does not operate there, I need to inspect the current facility to verify compliance with air quality regulations. She told me that the person I need to talk (Charles Crandall) is at lunch and would be back later.

After lunch, at about 1:15 PM, I came back to the facility. I met Mr. Crandall and showed my state identifications. I informed him that the previous company at this location had a permit with MDEQ-AQD and stated that I would like to inspect the facility to verify compliance with the air quality regulations.

He told me they are in the business of making door panels. I told him I need to inspect the facility to determine if their processes meet the air quality regulations.

He informed me that he cannot offer me the approval to enter and conduct inspection because the owner of the facility was not there. I provided him my business card and requested to contact me after discussing with the facility's owner. After that I left the facility without conducting inspection. During the following days, I did not receive a phone call from him.

Subsequently, on August 16, 2017, I contacted Charles Crandall, Blue Water Glass and reiterated my request for entry and inspection. I explained to him that the inspection needs to be conducted to verify compliance with the MDEQ-AQD rules and the requirements of the Permit to Install No. 92-07A. He wanted MDEQ-AQD to send a letter requesting such inspection. I told him about the Entry for Inspections brochure that MDEQ-AQD prepared provides details about the Department's right of inspection. He told me that was not sufficient. I informed him that I will talk to my supervisor and get back to him about the letter. Later, AQD-District Supervisor, Ms. Joyce Zhu contacted him about the inspection. She also told him that a letter won't be send, but Entry for Inspection brochure is available. He did not agree to that.

Following the previous contacts, on August 25, 2017, I contacted Blue Water Glass, twice, to explain to Mr. Crandall, about the importance and necessity of an inspection at the facility. First time, at about 10:20 AM, I left a voice message for him to contact me back. Second time, at about 1:45 PM, I left a message with the receptionist, for Mr. Crandall, to contact me. She told me that he is "on the road on a job" and would be back by Tuesday, August 29, 2017. I called back Blue Water Glass on the 29th, at about 2:50 PM, identified myself and informed the receptionist (Andrea) my intent to talk to Mr. Crandall. She agreed and put me on hold. After

few minutes, she asked me whether she could help me with anything. I informed her of my intent of conducting an inspection at the facility. She told me that she was the receptionist at the desk on the day I first visited the facility (on June 23, 2017) and she repeated that the facility told me (AQD Staff) to send a letter requesting in an inspection and upon receipt of the letter someone from the facility will contact me. As I tried to explain that MDEQ-AQD won't send a request letter and is in the process of getting an administrative warrant, she was impatient, and asked if I wanted to leave a message for Mr. Crandall. I agreed and left a message for him detailing my contact information, the purpose of my call and that he contact me by Wednesday, August 30, 2017. He never returned my call.

On September 19, 2017, I (Sebastian Kallumkal), and Kerry Kelly, Michigan Department of Environmental Quality-Air Quality Division, inspected Blue Water Glass facility located at 2401 16th Street, Port Huron, Michigan, after obtaining an Administrative Warrant from the St. Clair County Court in Port Huron, Michigan to enter and inspect this facility. Detective Lt. Erick Thorson, and Detective Dan Kennedy, Environmental Investigation Section, Michigan Department of Natural Resources – Law Enforcement Division assisted the MDEQ-AQD staff in conducting the inspection.

Upon arriving at the facility, I identified myself to the receptionist and served the administrative warrant. After few minutes, Charles Crandall, facility representative, met us in the lobby. He had the warrant with him. MDEQ/DNR staff identified themselves to Mr. Crandall and I explained the purpose of the inspection. He accompanied us to a conference room for a pre-inspection meeting.

He explained to us that the paint booths that the previous business (GMA Corporation) owned were gutted last year (2016). The building had left over chemicals and were cleaned up. City of Port Huron has an environmental report (DDCC Report approved by MDEQ-RRD) regarding the cleanup. BWG moved in September 2016. At that time, the building was completely cleaned up of stored chemicals.

Blue Water Glass fabricates and install wood, stainless steel or brass frames for glass front for buildings. Charles indicated that the facility does not have any boiler or emergency generator. In August 2017, BWG installed a semi-down draft, heated paint booth. They expect to use about 15-20 gallons coatings per month. The parts are not cleaned prior to coating. I advised them to keep monthly usage records of the primer coats, top coats, catalysts, reducers, thinners, etc. I informed them about the Rule 287(2)(c) exemption from the requirement to obtain a permit for the booth. He agreed to keep usage/purchase records of all coatings and solvents.

After the pre-inspection meeting, he and Mr. Rick Russell, Facility Manager accompanied us for an inspection of the facility. The facility has three CNC machines. They use biodegradable coolant for the CNC machines. The coolant is recycled. The mist from the coolant is vented to the general in-plant area. This cutting process is exempt from permit to install requirement pursuant to Rule 285(2)(1)(vi)(B).

The V-groover at the facility also uses the coolant. The coolant is contained in a reservoir and is flooded onto the cutting parts for cooling. Mr. Russell explained that the coolant is mixed 1:30 (water) and the mist from this process is vented to the atmosphere for employee comfort. The cutting process is exempt from permit to install requirement pursuant to Rule 285(2)(1)(vi)(B). From the description of the V-groove making process, it appears that metal dust emissions generated from this process are not exhausted to the atmosphere. The coolant mist exhaust appears to be exempt from permit to install requirements pursuant to Rule 280(2)(b). The facility also has three welding machines in a welding station. The emissions are vented to the atmosphere. The welding process is exempt from permit to install requirements pursuant to R336.1285(2)(i).

The facility has 3 press brakes, 1 sheer, 1 sander, 1 grinder, 3 ban saws, 1 hole puncher, 1 sand blasting process, one composite panel (cut metal and make groove), etc. The emissions from these processes are exhausted into the general in-plant environment. These processes appear to be exempt pursuant to Rule 285(2)(l)(vi)(B).

They also have one table saw. The emissions from table saw is collected in a baghouse and the exhaust is vented to atmosphere through a wall vent. The saw process is exempt pursuant to R336.1285(2)(l)(vi)(C). The facility also has a waterjet to cut the metals. The water is recycled. The sandblaster at the facility is exempt from permit to install pursuant to Rule 285(2)(l)(vi)(B).

We also observed a solvent based cold cleaner parts washer. The lid was closed at the time of the inspection. Kerry provided Charles a copy of the operating procedure that MDEQ prepared pursuant to Rule 707(4). He posted the procedure near the cold cleaner. The cold cleaner is exempt from PTI requirements pursuant to Rule 281(2)(h) Which exempts "Cold cleaners that have an air/vapor interface of not more than 10 square feet."

Next, we inspected the newly installed paint booth. Mr. Russel explained the booth. The attached heating system is natural gas fired, 1.44 MMBTU/hr. The paint usage for last month was about 35 gallons. The paint booth appears to be exempt from permit to install requirements pursuant to Rule 287(2)(c). Since the coating usage is low compared to monthly allowed usage, I informed Mr. Russell that using purchase records instead of the actual usage is acceptable. I emailed Mr. Russell a copy of the electronic spreadsheet and calculation methods to keep product information, log usage and calculate emissions. Mr. Crandall emailed Safety Data Sheets for coolants, and coatings, etc.

The facility also has couple of roof mounted, natural gas fired space heaters. These space heaters are exempt from permit to install requirements pursuant to R282(2)(b)(i).

We observed that the booths which were permitted under Permit to Install (PTI) No. 92-07A had been removed and the associated stacks have been capped.

Additional Information:

The MDEQ-AQD Administrative rules and exemption rules can be accessed using the web links below:

http://www.michigan.gov/deq/0,4561,7-135-3310_70314_4108---,00.html

http://w3.lara.state.mi.us/orr/AdminCode.aspx?AdminCode=Department&Dpt=EQ&Level_1=Air+Quality+Division

http://www.michigan.gov/documents/deq/deq-ess-caap-pti-exemptionbooklet_253795_7.pdf

Conclusion: Based on the inspection, Blue Water Glass appears to be in compliance with the applicable air quality regulations. I requested AQD Permit Section to void the PTI No. 92-07A.

NAME Sebastian Kallenka DATE 9/27/17 SUPERVISOR [Signature]