

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

N335564550

FACILITY: Techno-Coat Inc.		SRN / ID: N3355
LOCATION: 861 East 40th Street, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT:		ACTIVITY DATE: 04/21/2022
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On April 21, 2022 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 861 East 40th Street Michigan at 12:30 PM to conduct an unannounced air quality inspection of Techno-Coat, Inc. (hereafter TC) SRN (N3355). Staff made initial contact with the office Scott Eisen, TC, Process Engineer and stated the purpose of the visit. Mr. Eisen stated that Paul Nelson, TC, Plant Engineer, has historically been the environmental contact but was not in the office during the time of the inspection. Mr. Eisen stated that he could assist staff with the onsite portion of the inspection, but Mr. Nelson would be the contact for the records.

This facility is a powder coating facility that also operates burn off ovens to clean the racks that it powder coats on. The coating that is done is mainly of components for metal office furniture.

TC was last inspected by the AQD on April 16, 2013 and appeared to be in Non-compliance at that time with PTI No. 258-95 and General PTI No. 86-07. Staff asked, and Mr. Eisen stated that the facility does not have any emergency generators, boilers, or cold cleaners.

Mr. Eisen gave staff a tour of the facility. Required personal protective equipment are safety glasses, steel toe boots, hearing protection, and high visibility vest. Staff observations and review of records provided during and following the inspection are summarized below:

PTI No. 258-95:

This PTI is for an old Steelman Industries Inc. burn-off oven that has since been removed. Due to the unit being removed the PTI can be voided.

General PTI No. 86-07:

This is a general PTI that was issued for a burn-off that was installed around 2007. The burn-off oven is Model number 88-58-BA-C with Serial Number 080678.

TC appears to be complying Special Condition II.1-2. The facility is only using natural gas as fuel for the burn-off ovens and is not processing any materials other than cured paints, oil or greases on metal parts, racks, or hangers.

Special Condition IV.1 requires that the facility maintain a minimum temperature of 1400°F in the secondary chamber while batches are being processed. The facility is required to install a device that can continuously monitor the temperature of the secondary chamber and record temperature data at least once every 15 minutes. During the inspection Staff did observe a thermocouple readout that gave instantaneous data readings. Staff was provided with thermocouple temperature data for the following days: 10/20/21, 11/17/21, 12/9/21, 1/18/22,

2/8/22, 3/1/22, 4/1/22, and 4/21/22. From these records provided the facility appears to be operating the secondary combustion chamber above the minimum 1400°F besides start up and shutdown. The records are recording data in the necessary 15-minute intervals as required.

The facility is also keeping records of maintenance that is conducted on the ovens along with any malfunctions. Records show the date, who did the repair, and what was involved with from the maintenance or incident. The records show that the thermocouples for the secondary chamber was most recently replaced on 7/29/21. These appear to meet the maintenance and malfunction requirements of General PTI No. 86-07.

The burn-off oven was not operating during the inspection.

PTI No. 174-13:

This PTI was issued for the burn-off oven that replaced the old PTI No. 258-95 burn-off oven. This burn-off oven is a Steelman batch type natural gas-fired burn-off oven, Model 88-58-BAC that is used for removing powder coatings from steel production paint racks. The oven is equipped with a primary chamber of 0.480 MMBTU/hr and with a 1.0 MMBTU/hr after burner control system. The burn-off oven is referred to as EU-SB03E in the PTI.

EU-SB03E does have a limit on the number of batches that EU-SB03E per 12-month rolling time period. The limit established in the permit is 780 batches per 12-month rolling time period. Staff requested records of the batches for the period of January 2021 through April 2022. The largest number of batches that were processed during that time occurred in January 2021, which 742 batches were processed through the oven. This is close but still below the limit of 780 batches processed on a 12-month rolling time period. The number have batches processed have come down in 2022. The facility is averaging around 650 batches. The facility appears to be in compliance with Special Condition II.1. based on the records provided.

SB also appears to be complying Special Condition II.2-3. The facility is only using natural gas as fuel for the burn-off ovens and is not processing any materials other than cured paints, oil or greases on metal parts, racks, or hangers.

Special Condition IV.1 requires that the facility maintain a minimum temperature of 1400°F in the secondary chamber while batches are being processed. The facility is required to install a device that can continuously monitor the temperature of the secondary chamber and record temperature data at least once every 15 minutes. During the inspection Staff did observe a thermocouple readout that gave instantaneous data readings. Staff was provided with thermocouple temperature data for the following days: 1/18/22, 2/8/22, 3/1/22, 4/1/22, and 4/21/22. From these records provided the facility appears to be operating the secondary combustion chamber above the minimum 1400°F besides start up and shutdown. The records are recording data in the necessary 15-minute intervals as required.

The facility is also keeping records of maintenance that is conducted on the ovens along with any malfunctions. Records show the date, who did the repair, and what was involved with from the maintenance or incident. The records show that the thermocouples for the secondary chamber was most recently replaced on 10-18-21. These appear to meet the maintenance and malfunction requirements of PTI No. 174-13.

The burn-off oven was not operating during the inspection.

Powder Coating Lines:

The facility has three electrostatic powder coating lines. The facility refers to the powder coating lines as lines 2, 3, and 4. In Lines 3 and 4 the powder coating is applied manually. Line 2 has the powdered coating applied automatically. Lines 2 and 4 are set up in a similar way that has the coating controlled by a cyclone that leads to a fabric filter that then vents back into the plant. There is also a loading/cleaning station that is controlled by a fabric filter that also vents back into the room. Line 4 does have a transfer line that allows the facility to capture and reuse powder. Line 3 is set up in a fashion that has a primary filter that leads to a secondary filter before venting back in plant. These powder coating operations appear to be exempt from Rule 201 under Rule 287(d).

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with General PTI No. 86-07 and PTI No. 174-13. Staff stated to Mr. Eisen that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 1:45 PM.-CJY

NAME Cody Yuzgile DATE 9/14/22 SUPERVISOR RIL 9/15/22