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

N509429254

FACILITY: WOODSPECS INC		SRN / ID: N5094
LOCATION: 2240 SCOTT LAKE RD, WATERFORD		DISTRICT: Southeast Michigan
CITY: WATERFORD		COUNTY: OAKLAND
CONTACT: Andy Thome , Operations Manager		ACTIVITY DATE: 11/13/2014
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of an Opt-Out Source.		
RESOLVED COMPLAINTS:		

On November 13, 2014, I conducted an unannounced, scheduled, level 2 inspection of Woodspecs, Inc. (Woodspecs), located at 2240 Scott Lake Road in Waterford, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and Permit to Install (PTI) No. 165-00. On March 11, 2015 Air Quality Division (AQD) staff Kerry Kelly and I collected paint samples in a follow-up visit to the facility.

I arrived at Woodspecs at approximately 11 am on November 13th. I met with Mr. Andy Thome, Operations Manager, who provided a walkthrough of the facility and explained equipment and operations. I presented my credentials and provided Mr. Thome with a copy of "DEQ Environmental Inspections: Rights and Responsibilities."

Pre-Inspection Meeting/Facility Overview

Woodspecs is a Tier II supplier of primed plastic parts such as bumpers to the automotive industry. Priming occurs at the facility. According to Mr. Thome, Woodspecs currently has 12-18 employees and operates from 7:00 am to 3:30 pm Monday through Friday.

EU-SPECIALTYBOOTH

The specialty booth is used for specialty projects such as those requiring high-gloss paint. This booth was not operating during the inspection. The booth has a high-volume low-pressure (HVLP) applicator per PTI No. 165-00 Special Condition (SC) 6 and is a combined paint booth and oven. The oven operates at about 180°F and is natural-gas fired. A downdraft controls air emissions. Incoming air passes through a mesh filter in the ceiling and ambient emissions are controlled by a fiberglass filter in the paint booth floor. Both fiberglass and mesh filters were in place and appeared to be operating properly per SC 5. Filters are replaced every few weeks based upon static pressure readings.

EU-MAINLINE

The main line is a conveyorized paint line consisting of four HVLP applicator booths (per SC 6) back to back so parts can be coated on either side. The line was operating during the inspection with coating MPP6000A, a black solvent-based coating. I asked Mr. Thome to collect a sample of MPP6000A as applied for federal Reference Test Method 24 (Method 24) analysis. Mr. Thome sampled the coating for analysis and provided the coating's environmental datasheet and material safety datasheet (MSDS).

Filters are set up in two layers; mesh filters were in place with polyester pads behind. Filters appeared to be operating properly per SC 5; they were snug and tight and no fallout was observed. Filters are replaced daily or as needed according to Mr. Thome. Before being coated, parts pass through a dry-off oven. After coating, parts travel through a bake oven with temperatures ranging from 150-250°F. Both the dry-off and bake ovens are included in PTI No. 165-00.

EU-IRLINE

The infrared line was operating during the inspection. It consists of two HVLP applicator paint booths (per SC 6) back-to-back with mesh filters in front of polyester filters. Filters are replaced as needed and appear to be operating properly per SC 5. The infrared line is conveyorized. Parts travel through an electric convection oven operating at approximately 150°F. This oven is included in PTI No. 165-00. During the inspection, I asked Mr. Thome to collect a sample of DuPont Air Dry as applied. Mr. Thome collected a sample for analysis and provided the MSDS for the coating.

EU-COLORBOOTH
The color booth is a batch booth where colors are mixed and tested in small samples before full-scale batches are made. A computer system provides a color code, like a recipe, to produce a desired color. There is no oven or HVLP applicator associated with this booth. Filters appear to be operating properly per SC 5.

EU-BATCHBOOTH
When needed, any booth from other coating lines at the facility with an HVLP applicator serves as the batch booth. During the inspection, a table for the batch booth was set up at the same booth as the infrared line. The batch booth was not operating during the inspection. Coated parts are cured in a natural gas oven that operates typically around 170-180 °F. This oven is included in PTI No. 165-00.

Mixing Room
Inside the mixing room, surface coatings are stored and mixed into their designated ratios according to manufacturer–specified guidelines. Lids were on all containers. A cold-cleaner with a surface area less than 10 square feet was closed but not labeled. I used discretion to avoid issuing a violation notice for the labeling. I provided Mr. Thome with a cold cleaner label from AQD that satisfies R 611(3). The cold cleaner appears to be exempt from permitting requirements via R 281(h).

Waste Disposal
Outside of the mixing room, waste materials are stored in drums that are picked up by hazardous waste disposal company Midwest Transport Group every few months as needed. Mr. Thome provided a manifest of disposal that shows the drum was last picked up on June 23, 2014. This appears to be proper disposal per SC 10.

Stacks
Because of safety concerns from light snowy conditions we did not visit the facility roof. We observed stacks visible from the ground level. All visible stacks were unobstructed as per SC 9.

Distiller
Woodspecs has a 15-gallon distiller that cleans mask wash thinner so that it can be reused. Masks cover areas of parts that should not be painted. The distiller generally operates 8 hours a day Monday through Friday. The distiller appears to be exempt per R 285(u).

Recordkeeping
Mr. Thome provided a copy of September 2014 daily handwritten logs for the EU-SPECIALTYBOOTH, as well as HAP and VOC emission records for the entire facility spanning from January of 2013 to September of 2014. This recordkeeping is in accordance with SC 3 & 4.

VOC records show that since January of 2013, the highest 12-month rolling total for VOCs was 8.0 tons in September of 2014, below the permit limit of 29.0 tons per year. The highest VOCs per hour were 9.0 lbs/hr in January of 2013, below the permit limit of 35.3 lbs/hr per SC 1.

HAP records show that since January of 2013, the highest 12-month rolling total for HAPs was 4.7 tons in June of 2014, below the single or total HAP limits of 9.0 tons and 22.5 tons respectively per SC 2.

Coatings MPP6000A and DuPont Air Dry were collected during the November 13th site visit. Method 24 VOC content for coating MPP6000A is similar to its formulation data. Method 24 results for coating Dupont Air Dry showed a significantly higher VOC content than did Woodspecs records (5.13 lbs VOC/gallon coating compared to 4.1 lbs VOC/gallon coating). Woodspecs agreed to use the Method 24 test results for Dupont Air Dry in their recordkeeping.

Special Condition 7 – Method 24 and Formulation Data
Special Condition 7 in PTI No. 165-00 states "The VOC content of any coating as applied and as received shall be determined using federal Reference Test Method 24. Upon prior approval of the District Supervisor, Air Quality Division, VOC content may alternatively be determined from manufacturer's formulation data." On March 17, 2010 Woodspecs received conditional approval to use formulation data for coatings not Method 24 tested at that time. New coatings introduced after March 17, 2010 would require Method 24 testing or approval to use manufacturer's formulation data. According to records, 27 coatings were in records before March 17, 2010 approval. Since then, 11 new coatings have been added to records.

On January 15, 2015, Woodspecs requested to use formulation data for the 11 coatings added since their March 17, 2010 approval. I visited Woodspecs on March 11, 2015 with AQD staff Kerry Kelly to collect coatings 5L3KP

and M60B10 to compare Method 24 results with manufacturer's formulation data. Both 5L3KP and M60B10 are solvent-based coatings that were introduced after Woodspecs's March 17th, 2010 formulation data approval. Because Method 24 results for these two coatings were approximately equal to manufacturer's formulation data, AQD sent a conditional approval letter to Woodspecs on April 21, 2015 to use manufacturer's formulation data in lieu of Method 24. The conditional approval requires at least one sample be tested annually using Method 24. The conditional approval has a sunset date of December 31, 2020 and rescinds March 17, 2010 approval.

Compliance

As a result of this inspection, it appears that Woodspecs is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and PTI No. 165-00.

NAME _____ DATE 4/30/15 SUPERVISOR CJE