### DEPARTMENT OF ENVIRONMENTAL QUALITY FY2015 Inst. AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

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, Inc	SRN / ID: N6319
XOM	DISTRICT: Southeast Michigan
	COUNTY: OAKLAND
>	ACTIVITY DATE: 05/27/2015
COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
ALTA Equipment Company, Inc.	
	s, Inc XOM COMPLIANCE STATUS: Compliance ALTA Equipment Company, Inc.

N6319\_ SAR\_2015 05 27

ALTA Equipment Company (N6319) fka ALTA Lift Truck Services, Inc. (N6319) 28775 Beck Road Wixom, Michigan 48393-3637

SRN Reassign (2010): Adept Plastic Finishing -> ALTA Equipment Company (N6319)

Name change (FY 2013): ALTA Lift Truck Services, Inc. (N6319) - ALTA Equipment Company (N6319)

Void on April 27, 2010: PTI# 195-97A dated March 29, 2001, because the paint booths and the robots were removed and sold by Adept. Adept Plastic Finishing (Plant-2) sold the building to ALTA Lift (now known as ALTA Equipment Company) due to 2009 economic crisis.

Adept's Consent Order AQD No. 25-2002 executed on August 2, 2002: Terminated on September 29, 2005.

N6319 Operating Status: Adept Plastic Finishing's Plant No. 2 is sold to ALTA Lift (Jan 2010) and, consequently, job shop automotive parts painting ceased.

Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule: Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations

On May 27, 2015. I conducted a level-2 self-initiated inspection of ALTA Equipment Company, Inc. (fka ALTA Lift Truck Services, Inc.) ("ALTA") located at 28775 Beck Road, Wixom, Michigan 48393-3637. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

ALTA Equipment Company's products include forklifts, wheel loaders, excavators, pavers, and materials handling products such as pallet racking, ergonomic equipment and modular building systems. The core brands include Hyster Lift Trucks, Yale Lift Trucks, Volvo Construction Equipment, CombiLift Fork Lifts, Link-Belt Cranes, Gomaco Concrete Pavers.

Beck Road office is Corporate Headquarters. Adept removed all paint spray booths and robots and sold the building. ALTA purchased the building, remodeled and moved, in January 2010, ALTA Lift Truck Services from 28990 Wixom Road (A5118), Wixom, to Beck Road (N6319), Wixom. About December 2012, ALTA Equipment Company moved from 28990 Wixom Road (A5118), Wixom, Michigan 48393-3416, to 56195 Pontiac Trail (U-63-13- 0130), New Hudson, Michigan 48165-9702. Currently (FY 2015), the Wixom Road building is occupied by a collision shop. SRN **A5118** is reassigned to this new occupant at Wixom Road.

During the inspection, Mr. Aaron Johnson (Phone: 248-449-6700-ext. 1803; Fax: 248-305-2103; E-mail: Aron.Johnson@AltaEquipment.com), Parts Director, assisted me.

Mr. Matt Parzych (Ph: 248-449-6700-ext. 1833; Fax: 248-449-2789; E-mail: mattp@altalift.com), Branch Manager, separated about April 2015.

# 24 ft. \* 24 ft. paint spray booth

One 24 ft. \* 24 ft. paint spray booth with a side-draft dry filter system is installed. The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c) because it is maintenance booth that complies with Rule 287. Paint and solvent usage logs are kept. About 10-15 gallons per month of coating and solvents are used.

I asked Mr. Johnson to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. When exhaust air, laden with paint over-spray paint particles, bypass filters due to improper installation, property damage nuisance painting may be done on outside surfaces such as cars. Filters looked good during the inspection. One Dwyer inclined manometer is present to measure pressure drop ( $\Delta P$ ) across the filters;  $\Delta P$  was about 0.05 inches water during the inspection.

Lift trucks are painted in the booth. The painter stated that only water based industrial paints are used. To paints, hardener may be added. Clearcoat coatings, which are almost always solvent based, are not used.

# Cold-cleaner

One Crystal Clean parts washer is present. The cold-cleaner is subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. By definition, Crystal Cold cleaner is new because it was installed about 2009 at Wixom Road.

No halogenated solvent is used. Only petroleum distillates with relatively low vapor pressure are used. Therefore, as halogenated solvents are not used, the cold cleaner is not subject to NESHAP for Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; Federal Register / Vol. 59, No. 231 / Friday, December 2, 1994).

I asked Mr. Johnson to ensure that the cold-cleaners are kept closed at all times when idled. During a previous inspection, I gave to Mr. Parzych copies of DEQ's "cold-cleaner operating procedures". Decals were not posted and I gave Mr. Johnson (FY 2015) decals

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again for posting.

The lid is mechanically assisted. One Crystal Clean parts cleaner is "sink on a drum" type (55-gallon drum).

Crystal Clean (877-938-7948) 106 Mineral Spirits – Petroleum Naphtha Combustible Liquid. 100% VOC solvent. Specific Gravity (SG) = 0.79 at 60 °F. Density ( $\rho$ ) @ 60 °F = 6.58 pounds / gallon (0.790 kg /L). Vapor Pressure (VP) = 0.1 psia at 100 °F. Boiling Point (BP) = 300-419 °F. Flash Point (FP) = 106 °F T CC Method. Flammability range = 0.5 (LEL) -6 (UEL) %. Auto-ignition = 440-540 °F.

# Conclusion:

Both locations (Wixom and New Hudson) use cold-cleaners and paint spray booths.

Runahall Date 6/8/2015 SUPERVISOR