

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

N680129767

FACILITY: EnviroTech Coatings LLC		SRN / ID: N6801
LOCATION: 1900 Austin St, MIDLAND		DISTRICT: Saginaw Bay
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: Alan Popp, President		ACTIVITY DATE: 03/26/2015
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Discuss MAERS submittal, permitting existing new booth, and perform scheduled inspection.		
RESOLVED COMPLAINTS:		

Mr Alan Popp, the owner of Enviro Tech Coatings in Midland Michigan, had come to the MDEQ-AQD Saginaw Bay District office to discuss record keeping, permits, and the MAERS submittal. The company primarily blasts and paints metal piping for industrial uses but does other small jobs as the need arises. Ben Witkopp and Sydney Bruestle met with him. He explained he had decided to separate MAP Mechanical from Enviro Tech as MAP needed more space. As such the environmental responsibilities were also separated. He was now going to handle the responsibilities for Envirotech. He and his wife, Carolyn, had attended the MAERS training class and had made the submittal on time. We discussed a few shortfalls with the supporting documentation, primarily the lack of units for the various columns. We also reviewed the existing permit 52-00B and its requirements. General questions related to permitting were also answered as Alan said a new booth was installed. A date of March 26, 2015 was eventually settled upon to meet at the facility and have more discussions.

On March 26, 2015 we met Alan and Carolyn Popp at the headquarters for the facility. We discussed the MAERS submittal again as Carolyn had been the person who made the actual submittal. It was really quite good for a first time effort. They both said the class was very helpful. We then discussed the current permit for the facility. The permit 55-00B was reviewed and issued by Tom Julien of the MDEQ-AQD in 2010. It covers two booths used for spray coating metal parts. The first section of the permit basically functions like a general coating permit since it has VOC limits of 10.0 tpy (12 month rolling time period) and 2000 pounds per month for each line. It should be noted the permit only involves the two booths mentioned and does not allow for other lines to be installed even if they still met the criteria. However, the second section of the permit contains "opt-out" provisions covering hazardous air pollutants (HAPs) and VOCs. This type of combination permit is not normally done today. It is questionable if the permit would be issued in the same manner today. A general coating permit would probably be issued to cover the coating lines and then a separate permit issued to provide the "opt-out" provisions. This was explained to the Popps for their edification. It is up to the company whether to seek a revision of the existing permit or to get a general coating permit and a separate HAPs opt out permit. The record keeping they had on hand indicated compliance with the permit. For 2014, Booth 1 had a total of 2,607 pounds of VOC while Booth 2 had 6,084. The highest monthly amount - for both booths combined was only 1,088 pounds which is well below the 2,000 allowed for a single booth. Likewise, total HAPs were 6,086 pounds (3 tons) which is well below the 22.5 tons allowed as well as the 9 tpy allowed for a single HAP. The largest single HAP was mixed xylenes at only 1,885 pounds for 2014. Record review did not reveal any constituents which would make the facility subject to additional requirements found in the National Emission Standards for Hazardous Air Pollutants Subpart HHHHHH for spray application of coatings to a plastic and/or metal substrate.

We then went south across the road to the actual painting facility. We started out at the south end of the building. Booth one is found there and had a south and north stack. Mat / panel filters were in place but no painting was occurring. A Wheelabrator shot blast unit was located on the east side of the building with the dust collector located outside. Booth 2 was located a bit north of Booth 1. It had a south and north stack located on the west end of the booth. Alan explained it was constructed this way so two painting operations could occur at the same time. He said the rooms airflow can essentially be split in half and the painting on one side does not then affect the other side. Filters were in place but no painting was occurring. Alan said Booth 2 accounts for about 70% of usage due to its design allowing operational flexibility. No paint samples were taken because the painting operations were not yet set up and the permit does not have any VOC content limits. The painting operations use high volume, low pressure (HVLP) spray equipment. The building on the east side of the site is known as the blast barn where 70 -80% of all blasting occurs. The blast media is captured and recycled. A dust collector is used for particulate control.

Alan said the dust collector filters are changed on a regular basis. It should be noted that when filters are changed on a dust collector, all filters are replaced at the same time, not just those showing some wear. This action helps ensure continuity in the efficiency of the dust collectors.

Lastly we went to north end of the blast barn. Alan had installed a new booth / painting room there which contained three stacks. Two were on the north end at the west and east corner while the third was on the rooms southwest side. Alan said each stack was rated at 42,000 cfm. He confirmed they could be operated independently. The fans could also be run on high or in cure mode. This operation was installed without getting an air use permit thus resulting in a rule 201 violation.

The overall permitting strategy options were explained to the Popps. Subsequently, a copy of their of the existing permit was provided, as well as links to a general coating permit. A link to an air use permit to install was also provided in case a separate "opt-out" permit was needed. They were told a letter of violation would eventually be sent but they should start preparing the permit application because operation of the booth without obtaining a permit is not allowed.

On April 6, 2015 Alan inquired about re-doing the air permit and if that would occur in the near future. AQD responded by re-stating "In case we weren't clear about that, a permit application is filled out by the applicant, e.g. you. The permit section can't review an application until it is received from you. You can't legally use the new equipment until the permit is approved. Basically, the process begins when you start filling out the application. That is why I immediately sent links to the forms and instructions to you. I'm sorry if that wasn't made clear to you. If you have any questions let me know."

Staff inquired if a permit had been received in Lansing. As of June 3, 2015 they had not.

A violation notice will now be sent.

Enviro Tech Costing, LLC

Rolling run 2014

VOC's
HAP's

GAL	Monthly VOC	HAP	Yearly VOC	HAP	BOOTH # 1 VOC	HAP	BOOTH # 2 VOC	HAP	2014
288	206.24	206.47	16,863.88	16,830.51	4,700.03	4,689.15	10,068.00	10,041.20	JAN
284	431.27	301.96	15,409.50	15,139.29	4,640.49	4,541.79	10,827.81	10,597.60	FEB
280	781.24	548.98	15,229.04	14,940.19	4,587.81	4,493.85	10,728.23	10,462.34	MAR
332	632.77	443.03	14,793.62	14,187.58	4,439.53	4,256.27	10,359.03	9,931.31	APR
330	498.44	348.88	13,836.71	13,061.17	4,181.01	3,924.35	9,755.70	9,156.62	MAY
372	661.36	462.83	12,063.31	11,080.05	3,537.08	3,324.02	8,444.82	7,788.04	JUN
478	635.75	518.75	11,790.19	10,482.72	3,557.08	3,144.82	8,253.63	7,337.60	JUL
678	1,086.80	762.00	10,592.47	8,950.43	3,177.74	2,637.13	7,414.73	6,253.30	AUG
641	1,039.00	727.65	6,940.23	7,307.62	2,982.09	2,372.29	6,858.20	5,526.33	SEP
106	285.34	209.47	8,695.57	8,680.45	2,609.80	1,974.14	6,086.60	4,638.32	OCT
638	1,273.10	893.40	8,600.77	6,143.00	2,502.91	1,834.17	6,026.80	4,279.73	NOV
360	827.19	578.15	8,602.68	6,088.05	2,607.77	1,626.92	6,034.81	4,280.24	DEC
	8,892.59	6088.04							

Image 1(2014 records p 1) : Enviro Tech records 1

Enviro Tech Coatings, LLC -- Chemical HAP Totals For 2014

Benzene CAS# 71432 - 17.47lbs.
N-Butanol - 103.60lbs.
Ethyl Benzene - 671.15lbs
Ethyl Ethoxypropionate CAS# 763-69-9 - 21.7lbs.
Formaldehyde CAS# 50000 - 0
Hexane - 0
Hexamethylen - 0
Isophorone - 0
Methyl Alcohol CAS# 67-56-1 - 23.46 lbs.
Methyl Ethyl Ketone - 504.83lbs.
Methyl Isobutyl Ketone - 472.465lbs.
Methyl Methacrylate - 0
4,4-Methylenedianiline - 0
Naphthalene - 0
Phenol - 0
Tetrachloroethylene - 0
Toluene - 5292lbs.
Trichloroethylene - 0
Xylenes (Mixed CAS# 1330207) - 1885.828lbs.
O-Xylenes - 417.006lbs.
M-Xylenes - 1318.915

Image 2(2014 records p2) : Enviro Tech records 2

P-Xylenes - 581.605lbs.

Bisphenol CAS# 80-05-7 - 0

Glycol Ethers2 - 124.99lbs.

Trimethylbenzene - 0

Cumene CAS#98828 - 0

Styrene - 66.04lbs.

Methyl Isobutyl Ketone CAS#108101 - 0

Diisobutyl Ketone - 0

Butyl Acetate - 48.1lbs.

Petroleum Naphtha - 0

Titanium - 0

Image 3(2014 records p3) : Enviro Tech records 3

NAME

B. Witheff

DATE

6-16-15

SUPERVISOR

C. Hare