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

N680148483

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:** 03/21/2019
STAFF: Benjamin Witkopp	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

On March 21, 2019 Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) conducted an inspection of the facility. It is located in an industrial / commercial area east northeast of the intersection of Saginaw Rd. and Bay City Rd. in Midland County. It is likely most appropriately described as a coating job shop. The site operations consist of a fully enclosed blasting area and three paint booths The facility is covered by air use permit 52-00C. The permit does include "opt-out" limits for both individual hazardous air pollutants (HAPs) and aggregate HAPs.

The office area is now located upstairs in the north end of the west most building. Alan Popp is the owner of Enviro Tech Coatings. Greg Moore functions as the facility estimator / supervisor. Alan wasn't feeling well and said he was going to be leaving in a while. He told me to go wherever I wanted and feel free to speak with any of the employees if I had questions. He said he would supply records when I was done or if he was gone he would email whatever I needed.

I started out at the north end of the west most building. Booth 2 is located in the middle of the building and Booth 1 is on the south end. The painting operations use high volume, low pressure (HVLP) spray equipment. Booth 2 has a south and north stack located on the west end of the booth. It is designed to allow two painting operations to occur at the same time. 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 at the moment. Parts were drying in the booth and other items were being prepared to be painted later. Booth 1 had its mat / panel filters in place but no painting was occurring. It was not scheduled to be used that day. A Wheelabrator shot blast unit is located in the middle of the east side of the building with the dust collector for it located outside. It was not operating at the time. A worker said it is rarely used.

The building on the east side of the site is known as the blast barn where blasting occurs. The blast media is captured and recycled. A dust collector is used for particulate control. A worker had just finished parts setup and was ready to resume blasting. Once blasting was being conducted I waited a bit and then went outside to check for t any visible emissions. No visible emissions were seen. The newest spray booth is found on north of the blast barn. It uses three stacks. Two are on the north end at the west and east corner while the third stack is on the rooms southwest side. Each of the areas had filters in place and the areas could be operated independently. The fans could also be run on high or in cure mode. A trailer had been painted earlier. As I left the booth a painter was returning to continue painting. He confirmed that booth is still used primarily for larger items due to its easy and ability to handle them.

The first section of the permit deals with the new booth, identified as booth 3. It has VOC limits of 3.0 tpy, based on a 12 month rolling time period, and 2,000 pounds per month. Corresponding record keeping was randomly checked through July 2018. The 12 month rolling time period showed 0.788 tons of VOCs. The highest pounds per month was 256.5 occurring in April 2018. The rest of the conditions concerning filters, application equipment etc., are similar to those found for the other booths and were verified during the inspection.

The second 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 2,000 pounds per month for each line. The third section of the permit contains "opt-out" provisions covering hazardous air pollutants (HAPs) and VOCs. The limits found there concern the entire facility. Each hazardous air pollutant (HAP) is limited to less than 9.0 tpy. Aggregate HAPs are to be less than 22.5 tpy. Lastly, total VOC's are limited to 30.0 tpy. All of these limits are based upon a 12 month rolling time period.

Spot checking of material information did not reveal any constituents (e.g. cadmium, etc.) 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.

The information checked, ending in July 2018, indicated each of the other two booths to be below permitted levels. Booth 2 had a little over two tons of VOC while booth one had about 1.34 tons on a 12 month rolling time period. Booth two's highest month had 676 pounds in August of 2017 and the same month was highest for booth 1 at 664 pounds The facility total was 4.18 tons of VOC on a 12 month rolling time period.

HAPS were also checked for the 12 month rolling time period ending with July 2018. The largest emission of a single HAP was 1.24 tons on a 12 month rolling time period. The emission of all HAPS aggregated was 2.64 tons. The emission amounts are well below the limits previously mentioned.

One problem was found when the 12 month rolling time period ending with December 2018 was checked. It indicated two months from 2017 were included. I will return to the facility to point it out to Mr. Popp as it should be easily corrected.

The facility is considered to be in compliance.

NAME B. Mitchell DATE 4-15-19 SUPERVISOR C. Haas