

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

N694035281

FACILITY: Ventra Ionia Paint, LLC		SRN / ID: N6940
LOCATION: 719 West Main Street, IONIA		DISTRICT: Grand Rapids
CITY: IONIA		COUNTY: IONIA
CONTACT: Mike Sladewski, EHS Manager		ACTIVITY DATE: 06/27/2016
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Inspection		
RESOLVED COMPLAINTS:		

**Unannounced inspection of Ventra Ionia Paint Facility.**

**FACILITY DESCRIPTION**

The facility paints metal bumpers through the use of an e-coating line and spray coating line.

The facility operations include the following equipment:

E-coat line including pretreatment tanks, E-coat tank, curing oven and cooling tunnel.

Paint Kitchen

Spray coat line consisting of a primer booth with two robotic bells, base coat booth with four robotic bells, clear coat booth with four robotic bells, cooling tunnel and cure ovens.

The E-coat line and wet coat lines are controlled by a single thermal oxidizer. Each wet coat spray booth/area is equipped with dry filters for particulate overspray control.

**REGULATORY ANALYSIS**

The facility has one opt-out NSR permit (PTI#277-99A) that covers all process currently at the facility. This permit was issued in 2007 as a modification that increased the total allowed TPY VOC limit slightly (0.7 tons), eliminated the pound per hour VOC emission limit, eliminated the VOC limit for the coatings, and combined emission limits for the wet and e-coat lines.

**COMPLIANCE EVALUATION**

Prior to entering the facility a survey downwind was made. No opacity or abnormal odors were noted. At the facility staff consisting of Chris Robinson and Eric Grinstern met with Jeff Erridge, Ionia Paint Plant Manager and Steve Stansil, Safety Manager. Mike Sladewski, EHS Manager, was working outside of the facility on the day of the inspection. Mr. Erridge and Mr. Stansil provided a tour of the facility on the day of the inspection and records were subsequently provided by Mr. Sladewski.

**APPLICABLE RULES/PERMIT CONDITIONS**

All processes at the facility are covered under Opt-Out Permit No. 277-99A. The special conditions evaluated during this inspection and the compliance status is summarized below.

**FGCOATING**

Group includes EUCOATINGLINE and EUECOAT (wet coating line and e-coat line)

Permit Conditions						
1.1	VOCs	49.85 tpy	12-month rolling time period as determined at the end of each calendar month	FGCOATING	SC 1.12 & SC 1.13	R 336.1702(a)

**Comments:** Based on facility records (attached) the facility emitted 18.85 tons of VOCs for the previous 12-month period.

**Status:** Compliant

#### **Process / Operational Limits**

**1.2** The permittee shall capture all waste coatings, thinners, reducers, catalysts, additives, solvents, and VOC containing phosphate agents shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1702(a))

**Comments:** During the inspection the tote used to hold waste materials was observed in the paint kitchen.

The facility stated that they store all material according to the above requirement.

**Status:** Compliant

**1.4** The permittee shall handle all VOC containing materials, including coatings, reducers, solvents thinners, and phosphate agents, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

**Comments:** The facility stated that they handle all material according to the above requirement.

Additionally, during the inspection staff did not observe any of the above listed materials to be handled in violation of the above permit condition.

**Status:** Compliant

**1.5** The permittee shall not operate any paint booth portion of FGCOATING unless all respective exhaust filters are installed and operating in a satisfactory manner. (R 336.1224, R 336.1901, R 336.1910)

**Comments:** During the facility tour, all filters appeared to be installed and operating properly. The facility provided details regarding the replacement schedule of the various filters.

**Status:** Compliant

**1.6** The permittee shall equip and maintain each paint booth portion of FGCOATING with automatic robotic bells or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702(a))

**Comments:** The facility continues to use automatic robotic bells.

**Status:** Compliant

**1.7** The permittee shall not operate FGCOATING unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 96 percent (by weight), and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. (R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910)

**Comments:** The thermal oxidizer is installed and operating. It is assumed that it is operating satisfactory based on review of charts of recorded temperature readings. The facility assumes compliance with the 96% destruction efficiency based upon manufacture specifications.

**Status:** Compliance

**Testing**

1.8 The permittee shall determine the VOC content, water content, and density of any coating, thinner, reducer, catalyst, additive, solvent, and VOC containing phosphate agent as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1225, R 336.1702, R 336.1901, R 336.2001, R 336.2003, R 336.2004)

Status: Compliant

**Monitoring**

1.9 The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer on a continuous basis, when FGCOATING is in operation, in a manner and with instrumentation acceptable to the Air Quality Division. (R 336.1224, R 336.1225, R 336.1702, R 336.1901)

Comments: The facility monitors and records the TO on a continuous basis.

Status: Compliant

**Recordkeeping / Reporting / Notification**

1.10 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1225, R 336.1702, R 336.1901)

Status: Compliant

1.11 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, thinner, reducer, catalyst, additive, solvent, and phosphate agent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702, R 336.1901)

Comments: The facility maintains a database of all material data.

Status: Compliant

1.12 The permittee shall keep the following information on a monthly basis for the FGCOATING:

- a) Gallons (with water) of each coating, thinner, reducer, catalyst, additive, solvent, and VOC containing phosphate agent used.
- b) VOC content (with water) of each coating, thinner, reducer, catalyst, additive, solvent, and phosphate agent as applied.
- c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
- e) Hours of operation.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1901)

Comments: The facility maintains the above records and supplied requested copies.

Status: Compliant

1.13 The permittee shall keep the following information on a monthly basis for the use of purge and

**clean-up solvents associated with FGCOATING:**

- a) Gallons of each solvent used and reclaimed.
- b) VOC content, in pounds per gallon, of each solvent used.
- c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1225, R 336.1702, R 336.1901)

**Comments:** The facility maintains the above records and supplied requested copies.

**Status:** Compliant

**1.14** The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702, R 336.1901)

**Comments:** The facility maintains temperature charts.

**Status:** Compliant

**Stack/Vent Restrictions**

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.15	SVRTO	48.0	75.0	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

**Comments:** Visual observation of the stack showed that it appeared to meet the above restrictions.

**Status:** Compliant

**The following conditions apply to: FGFACILITY**

**Emission Limits**

	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirements
2.1a	Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC 2.4	R 336.1205(3)
2.1b	Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC 2.4	R 336.1205(3)

**Comments:** Facility records show that the facility emitted 2.73 tons of total HAP and 0.83 tons for the largest amount of a single HAP (hexane) for the past 12-month period.

**Status:** Compliant

#### Testing

**2.2** The permittee shall determine the HAP content of any material as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))

**Comments:** The facility maintains a database of HAP content for all materials.

**Status:** Compliant

#### Recordkeeping / Reporting / Notification

**2.3** The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(3))

**2.4** The permittee shall keep the following information on a monthly basis for FGFACILITY:

- a) Gallons or pounds of each HAP containing material used.
- b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1205(3))

**Comments:** The facility maintains the above records and supplied requested copies.

**Status:** Compliant

#### FINAL COMPLAINT DETERMINATION

Based on this inspection, the facility is in compliance with applicable air quality rules and regulations at this time.

NAME 

DATE 7/13/16

SUPERVISOR 