

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

N694050508

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: 08/29/2019
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with Permit to Install (PTI) number 277-99A and other applicable rules and regulations.		
RESOLVED COMPLAINTS:		

On Thursday August 29, 2019 Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff Kaitlyn DeVries (KD) and Scott Evans (SE) conducted an unannounced, scheduled inspection of Ventra Ionia Paint, LLC located at 719 West Main Street, Ionia Michigan. The purpose of this inspection was to determine compliance with Permit to Install (PTI) number 277-99A and other applicable rules and regulations.

KD and SE arrived at the facility around 9:00 am and met with Mr. Mike Sladewski, Environmental Manager and Mr. Ray Granger, Paint Facility Manager, and others who accompanied staff on the tour of the facility. Prior to arriving on site, staff observed the vicinity for any excess odors or opacity; none were noted.

Facility Description

Ventra Ionia Paint, LLC (Ventra) is a coating facility that paints bumpers via an e-coating line and a spray coating line for the auto industry.

Regulatory Analysis

Ventra currently holds one (1) Opt-out PTI, PTI No. 277-99A and is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

Compliance Evaluation

The facility is comprised of an e-coat line and a wet spray coating line. The spray coating line, EUCOATINGLINE, consists of a primer booth equipped with two (2) robotic bells applicators, a basecoat booth equipped with four (4) robotic bells applicators, a clearcoat booth equipped with four (4) robotic bells applicators, and associated ovens and flash-off area. The VOC emissions from the line are controlled by the thermal oxidizer, and the wet coat spray booths are equipped with dry filters for particulate overspray control. EUECOAT is a fifteen (15) stage electrocoat line which includes a phosphate tank, an electrocoat dip tank, and a curing oven. The VOC emissions from the curing oven are controlled by a thermal oxidizer. This is the same thermal oxidizer as EUCOATINGLINE is controlled by. Together, these emission units comprise the flexible group FGCOATING. Both lines were in use at the time of the inspection.

Emissions of VOC's from FGCOATING are limited to 49.85 tons per year (tpy) based upon a 12-month rolling time period. Records indicate a 12-month rolling total emission of 46.08 tons. This is an increase in emissions comparatively to the 2018 MAERS data but can be attributed to several months in 2019 that had higher volume. Ventra should be mindful that they are at 93% of their limit and if production is expected to increase, Ventra may want to come in for a new permit to increase the VOC limit. Ventra is properly tracking the VOC emissions as well as the gallons of each coating used, including the VOC content of each solvent and coating used. Ventra is also properly tracking the hours of operation for the coating lines, averaging between 693.3 hours and 705 hours per month.

As previously mentioned, the wet coat spray booths are equipped with dry filters for particulate overspray control. KD and SE were able to view EUCOATING, and the filters appeared to be properly installed. Mr. Sladewski indicated that the spent filters are stored in a closed container prior to disposal via landfill. All other waste containers were closed during the inspection, and observations of the paint kitchen also showed that the paints were in closed containers.

Emissions from the e-coat line and the wet spray coating line (FGCOATING) are controlled by a thermal oxidizer. The Oxidizer is required to have a minimum destruction efficiency (DE) of 96% by weight, a minimum

temperature of 1400°F, and a minimum retention time of 0.5 seconds. PTI No. 277-99A (and previous iterations of the permit) does not require stack testing to demonstrate compliance with the DE. KD asked Mr. Sladewski if Ventra had conducted testing on the unit, and they indicated they haven't. Ventra rather relies on the manufacturer's specifications of DE at 96% and conducts weekly, monthly, and annual maintenance on the oxidizer. Temperature records around the 1550°F. Mr. Sladewski indicated that they have interlock control on the unit, and the lines will shutdown if the temperature drops below the set point.

The stack dimensions, while not explicitly measured, appeared to be correct.

Staff also viewed the e-coat line, and the tanks were labeled and in good condition. The tanks consisted of varying materials including water wash tanks, a phosphate tank, and electrocoat dip tank.

Ventra has facility wide HAP emission limits, limiting individual HAPS to less than 9.0 tpy and less than 22.5 tpy for aggregate HAPS; both are based upon 12-month rolling time periods. Records indicate that the aggregate HAP emissions through July 2019 were 5.30 tons. The highest individual HAP emitted was xylene isomers at 3.35 tons. Ventra is properly tracking the emissions data, as well as the usage of HAP containing materials.

Compliance Determination

Based upon the observations made during the inspection and a subsequent review of the records it appears that Ventra Ionia Paint, LLC is compliant with PTI No. 277-99A.

NAME *Justin M. Price* DATE 9/23/2019 SUPERVISOR *[Signature]*