

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N694064847

FACILITY: Ventra Ionia Paint, LLC		SRN / ID: N6940
LOCATION: 719 West Main Street, IONIA		DISTRICT: Grand Rapids
CITY: IONIA		COUNTY: IONIA
CONTACT: Chris Outman , Environmental Manager		ACTIVITY DATE: 09/21/2022
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site compliance inspection		
RESOLVED COMPLAINTS:		

Facility Description

Ventra Ionia Paint, LLC. is located in the city of Ionia, in Ionia County. The facility coats automotive bumpers in an e-coating line and a spray coating line.

Regulatory Analysis

The facility's operations are covered by an Opt-out permit, PTI No. 277-99A, and is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

Compliance Evaluation

Prior to entering the facility, AQD staff consisting of Eric Grinstern (EG) surveyed the perimeter of the facility from the public roadway. No odors or opacity were detected. Upon arrival at the facility, staff met with Mr. Michael Sladewski, Environmental Director, and Chris Outman, Environmental Manager.

Below is an evaluation of compliance based on PTI No. 277-99A.

The permit requirements for the wet coating line, EUCOATINGLINE, and the e-coating line, EUCOAT, are contained in the flexible group, FGCOATING. Additionally, facility-wide HAP opt-out limits are contained in FGFACILITY.

EUCOATINGLINE

DESCRIPTION: A coating line consisting of a primer booth equipped with 2 robotic bells, a basecoat booth equipped with 4 robotic bells, a clearcoat booth equipped with 4 robotic bells, and associated ovens and flashoff areas. VOC emissions from this line are controlled by a thermal oxidizer.

EUECOAT

DESCRIPTION: A 15 stage electrocoat line which includes a phosphate tank, an electrocoat dip tank, and a curing oven. VOC emissions from the curing oven are controlled by a thermal oxidizer.

FGCOATING

Emission Units: EUCOATINGLINE and EUECOAT

EMISSION LIMITS/RECORDKEEPING

The permit limits the emission of VOCs to 49.85 tpy, based on a 12-month rolling time period.

Compliance with the VOC emission limit is based on proper operation of the control equipment and compliance testing. Compliance with the emission limit via testing has not been required yet. The facility demonstrates compliance with the emission limit through the requirement to calculate and maintain VOC emission rates on a monthly and 12-month rolling time period.

The facility provide requested VOC emission records for the most recent 12-month time period. Review of the records showed VOC emissions for the 12-month time period ending in August 2022 at 39.81 tons, which is complaint with the 49.85-ton limit.

PROCESS / OPERATIONAL LIMITS

The facility is required to:

Capture all waste coatings, thinners, reducers, catalysts, additives, solvents, and VOC containing phosphate agents and shall store them in closed

containers, as well as dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.

Dispose of spent filters in a manner which minimizes the introduction of particulate air contaminants to the outer air.

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.

During the inspection, staff did not observe any activities contrary to the above requirements. Inspection of the paint kitchen showed covers on the paint containers.

EQUIPMENT

The facility is required to:

Not operate any paint booth portion of FGCOATING unless all respective exhaust filters are installed and operating in a satisfactory manner.

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.

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.

During the inspection, staff did not observe any activities contrary to the above requirements. Observation of the paint booths showed exhaust filters installed. Observation of the thermal oxidizer showed a temperature reading of 1648 degrees F.

The temperature setpoint was 1550 degrees F. The unit has an interlock that will shut down the coating lines if the temperature drops below the setpoint. The facility stated that preventative maintenance is conducted by an outside contractor twice a year, and the temperature gauge is calibrated once a year. The facility replaced the ceramic in the thermal oxidizer in 2018.

MONITORING

The facility is required to monitor the temperature of the thermal oxidizer on a continuous basis. Staff observed the device that monitors the temperature of the thermal oxidizer on a continuous basis.

RECORDKEEPING / REPORTING / NOTIFICATION

The facility is required to maintain monthly usage records for coating and purge and clean-up solvents used in FGCOATING, VOC content of material used in FGCOATING, monthly and 12-month rolling VOC emission records and hours of operation.

The facility provided requested records for the most recent 12-month time period, in compliance with the required recordkeeping conditions.

The facility is required to keep continuous records of the temperature in the thermal oxidizer. The facility provided the requested temperature charts for the most recent 30-day time period. The charts showed that the TO temperature was above 1400 degrees F at all times, except one period of time that was noted for a shut down to replace a valve.

STACK/VENT RESTRICTIONS

The thermal oxidizer is required to have a stack that is a minimum of 75 feet high and a maximum of 48 inches in diameter. The stack was not measured, but visual observation showed that it appeared to meet the restrictions.

FGFACILITY

EMISSION LIMITS/RECORDKEEPING

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.

The facility provided requested records for the past 12-month time period. The total recorded aggregate HAPs was 5.12 tons, with the highest individual HAP emitting being xylene at 3.30 tons. The facility also provided requested records of HAP containing material usage.

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 applicable air quality rules and regulations, as well as PTI No. 277-99A.

NAME Eric Grinstern

DATE 9/30/2022

SUPERVISOR HH