

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

N748658735

FACILITY: Pratt Industries Inc.		SRN / ID: N7486
LOCATION: 11365 RED ARROW HWY., BRIDGMAN		DISTRICT: Kalamazoo
CITY: BRIDGMAN		COUNTY: BERRIEN
CONTACT: Siva Masetty, Mechanical Engineer		ACTIVITY DATE: 06/23/2021
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	
SUBJECT: Scheduled Inspection due to Current Covid-19 Pandemic Protocols.		SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:		

On June 23, 2021 AQD Staff (Matt Deskins) went to conduct a scheduled inspection of the Pratt Industries facility located in Bridgman, Berrien County. The inspection had to be scheduled due to current Covid-19 protocols. According to district file records Pratt Industries is a synthetic minor/opt-out source and it shows that they have an opt-out permit (PTI No. 82-12) issued to them by the AQD for two spray booths. Staff had scheduled the inspection for 10:30 a.m. so staff departed for the facility at approximately 9:10 a.m.

Staff arrived at the Pratt Industries at approximately 10:20 a.m. Prior to entering the facility, staff took a few minutes of see if there were any visible emissions coming from the building or stacks and none were noted. Staff then proceeded into the office area. Upon entering the office area staff, staff was greeted by Siva Masetty who they had scheduled the inspection with and whom staff has met with a times in the past for inspections. Siva then led staff back to the office of Tom Hogan who is the new Plant Manager. Tom wasn't there so Siva contacted him and asked him to come into the office when he got the chance which he did a couple of minutes later. When Tom came in staff introduced them self and we then exchanged business cards. Staff then explained what the inspection would entail which would basically include a review of any records required to be kept by their opt-out permit for their coating booths and a plant tour of their operation. Staff then mentioned that prior to doing either of those that they would like to talk with them about plant operations. The following is a summary of staff's conversation with Siva and Tom, what was observed during the plant walk through, and the facilities compliance status with their permit conditions.

According to Siva and Tom, Pratt Industries main business is still the building of semi-truck tractor trailers. They mentioned that this facility had been shutdown for approximately the last year or so after the Covid Pandemic first hit and they just started minimal operations again back in February. They mentioned that they are trying to hire people but are having a hard time getting personnel. Siva said that they've actually lost work because they couldn't fulfill the customer orders on time. They said that currently they employ 33 people (including office personnel) and the are working 1 shift Monday through Friday from 6:00 a.m. until 2:30 p.m. Historically they had operated 3 shifts and typically had between 80 to 90 employees. Staff then asked if they still just had the 2 spray booths and both Siva and Tom responded that they did. They said nothing new has been added since staff was last there. Staff then asked if they still had the sand blasting building to which they replied that was still there as well. Staff then asked if they use Acetone and MEK for clean-up purposes still. Siva mentioned that currently they are only using one coating (black) and that they no longer use Acetone or MEK for clean-up. They have a Solvent Blend that is used and staff remembered looking at the SDS for it when they had inspected their Niles location last year. Staff then went with Siva and Tom on a tour of the facility.

According to Siva and Tom, they still receive all the metal trailer parts in certain sized sections and they do no cutting of it on site. They went on to state that they will take these sections and weld them together to make the trailer. The welding is exempt from permitting under the AQD Rule 285(i). Once the trailer has been welded together it will then head to the sand blasting building. Once it has been blasted, it will then go into one of the two spray

booths for painting. The paint booths are large enough to fit the whole trailer inside. When staff looked at the booths it was noted that the particulate filters were in place and they all looked to be in good condition. Both booths can also act as curing ovens if needed and can get up to temperatures of approximately 120 degrees F. Once the trailer has been painted it will go to the finishing area. In the finishing area employees will install tires, hydraulic hoses, air-break tanks, lights, stickers, etc. Once it has been finished it will be put outside and is ready for the customer.

Staff then proceeded outside with Siva and Tom to go over to the sand blasting building. The sand blasting unit itself wasn't in use when staff was there but a trailer was inside ready to be blasted. Staff had mentioned to Tom that the AQD has had issues over the years with this unit, mainly from not maintaining the filter system which allowed emissions to exhaust outside. Tom said he would be mindful of that. Staff then proceeded with them back to Tom's office. Once back at the office staff went over the special conditions of PTI No. 82-12. The following lists the special conditions and what staff observed with regards to compliance with them.

NOTE: Since the facility just started operations back up in February after being shutdown for about a year, 12- month rolling numbers will not be very high.

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-CoatingLine-01	One 60' (L) x 16' (W) x 16' (H) paint booth for the liquid coating (primers and topcoats) of trailers.	07-31-2012	FG- CoatingLines, FG-Facility
EU-CoatingLine-02	One 60' (L) x 16' (W) x 16' (H) paint booth for the liquid coating (primers and topcoats) of trailers.	07-31-2012	FG- CoatingLines, FG-Facility
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-CoatingLines	Two coating lines for the liquid coating of trailers.	EU-CoatingLine-01, EU-CoatingLine-02
FG-Facility	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	All source-wide process equipment

The following conditions apply to: FG-CoatingLines

DESCRIPTION: Two coating lines for the liquid coating of trailers.

Emission Unit ID: EU-CoatingLine-01 and EU-CoatingLine-02.

POLLUTION CONTROL EQUIPMENT: Dry filters to control particulate matter

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	60.0 tpy	12-month rolling time period as determined at the end of each calendar month	FG-CoatingLines	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d), R 336.1224
2. VOCs	3.5 lb/gal (minus water) ^a as applied	Daily volume-weighted average.	Each Coating Line Portion of FG-CoatingLines	SC VI.1, SC VI.2, SC VI.3	R 336.1702(d)
3. Glycidyl Ether of 3-Alkyl Phenol (CAS No. 171263-25-5)	31.0 pounds per year	12-month rolling time period as determined at the end of each calendar month	FG-CoatingLines	SC VI.1, SC VI.2, SC VI.4	R 336.1225(1)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
<p>^a The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))</p>					

AQD Comment: Appears to be in Compliance with the above. Records provided to staff indicate the most recent 12-month rolling total ending in May 2021 for VOCs was 1.7 tons and the pounds per gallon of coating was 3.4. The facility wasn't tracking the emissions for #3 above but according to Siva, they don't use the coating (Jones-Blair) that contained it anymore.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall recover and reclaim, recycle, or dispose of all paints and coatings including purge and clean up solvents (materials) used for FG-CoatingLines, in accordance with all applicable regulations. (R 336.1224, R 336.1702(a))

AQD Comment: Will assume to be in Compliance. According to Siva, Superior Environmental still handles all of their waste for them when needed.

2. The permittee shall capture all waste materials and 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 336.1224, R 336.1702(a))

AQD Comment: Appears to be in Compliance. Staff did not observe any waste issues during the inspection.

3. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)

AQD Comment: Will assume to be in Compliance. According to Tom, they currently change out the filters as needed and dispose of them properly.

4. The permittee shall handle all VOC, acetone, and / or HAP containing materials, including coatings, reducers, solvents and thinners, 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))

AQD Comment: Appears to be in Compliance. Staff did not observe any issues during the inspection.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FG-CoatingLines unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1901, R 336.1910)

AQD Comment: Appears to be in Compliance. Both spray booths were equipped with filters.

2. The permittee shall equip and maintain FGCoatingLines with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702(d))

AQD Comment: Appears to be in Compliance. The facility uses HVLP spray applicators. Staff did ask about test caps for pressure testing.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall determine the VOC content, water content and density of any material, as applied and as received, using federal Reference Test Method 24. Upon prior written 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 336.1205(3), R 336.1225, R 336.1702(d), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

AQD Comment: Will consider them to be in Compliance since the facility's paint supplier (Niles Chemical Paint) stated they used that method. Also, as mentioned earlier, they are only using one coating at the facility right now. In the future should they start using more coatings again staff stated that they should request approval from the AQD supervisor to use SDS data.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. 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 monitoring/recordkeeping special condition. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(d))

AQD Comment: Appears to be in Compliance. The amount of coatings (currently just one coating) they use in each booth is tracked on a job sheet with each trailer and then gets inputted into a computer spreadsheet.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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 and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(d))

AQD Comment: Appears to be in Compliance. The facility maintains data sheets.

3. The permittee shall keep the following information on a calendar day basis for each coating line
(EU-CoatingLine-01 and EU-CoatingLine-02) of FG-CoatingLines:

- a) Gallons (with water) of each VOC containing material used and reclaimed
- b) VOC content (minus water and with water) of each material as applied.
- c) VOC emission calculations determining the volume-weighted average VOC content of the coating of each metallic surfaces coating line as applied on a calendar day basis.

- d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- e) 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 and make them available to the Department upon request. (R 336.1205(3), R 336.1225, R 336.1702(d))

AQD Comment: Appears to be in Compliance with the above.

4. The permittee shall keep the following information on a calendar month basis for FG-CoatingLines:

- a) Gallons (with water) of each Glycidyl Ether of 3-Alkyl Phenol (CAS No. 171263-25-5) containing material used.
- b) Where applicable, gallons (with water) of each Glycidyl Ether of 3-Alkyl Phenol (CAS No. 171263-25-5) containing material reclaimed.
- c) The Glycidyl Ether of 3-Alkyl Phenol (CAS No. 171263-25-5) content (with water) in pounds per gallon of each material used.
- d) Glycidyl Ether of 3-Alkyl Phenol (CAS No. 171263-25-5) mass emission calculations determining the monthly emission rate in pounds per calendar month.
- e) Glycidyl Ether of 3-Alkyl Phenol (CAS No. 171263-25-5) mass emission calculations determining the annual emission rate in pounds 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 and make them available to the Department upon request¹. (R 336.1225(1))

AQD Comment: Will consider them to be in Compliance with the above at the present time since they don't use the coating that contained these compounds.

VII. REPORTING

Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FG-CoatingLines authorized by this Permit to Install, the permittee or the authorized agent pursuant to

AQD Comment: Will consider them to be in Compliance. According to AQD records, the facility never submitted notification of when the two spray booth installations were completed, however; another AQD inspector had been out there after they had been installed and noted it.

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or

modification is considered to occur not later than commencement of trial operation of FG-CoatingLines. (R 336.1201(7)(a))

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-CoatingLine-01	42.0	38.0	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-CoatingLine-02	42.0	38.0	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

AQD Comment: Appears to be in Compliance with the above.

IX. OTHER REQUIREMENTS

1. Within thirty days of completion of installation (FG-CoatingLines), the permittee shall label each emission unit (coating line) including their associated control equipment according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. (R 336.1201)

AQD Comment: Appears to be in Compliance with the above.

The following conditions apply Source-Wide to: FG-Facility

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

Emission Unit ID: All source-wide equipment.

POLLUTION CONTROL EQUIPMENT: Dry filters to control particulate matter as mentioned in FG-CoatingLines

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy *	12-month rolling time period as determined at the end of each calendar month	FG-Facility	SC VI.1, SC VI.2	R 336.1205(3)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
2. Aggregate HAPs	Less than 22.5 tpy *	12-month rolling time period as determined at the end of each calendar month	FG-Facility	SC VI.1, SC VI.2	R 336.1205(3)
3. VOCs	Less than 90.0 tpy	12-month rolling time period as determined at the end of each calendar month	FG-Facility	SC VI.1, SC VI.3	R 336.1205(3)
4. Naphthalene (CAS No. 91-20-3)	1102.3 pounds per year	12-month rolling time period as determined at the end of each calendar month	FG-Facility	SC VI.1, SC VI.4	R 336.1225(2)

* Beginning on permit issuance date, and continuing for the first 12 calendar months, this limit applies to the cumulative total HAP emissions. Thereafter, the limit shall become a 12-month rolling limit.

AQD Comment: Appears to be in Compliance with the above. 12-Month Rolling Totals Ending May 2021 indicate the Highest individual HAP was Xylene at 240.55 pounds and Aggregate HAPs was 0.19 tons. The VOC's were 1.7 tons. Naphthalene is not currently in the one coating that is used.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall determine the HAP content of any paint and coating including purge and clean up solvent (material) as received and as applied, 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))

AQD Comment: Appears to be in Compliance with the above.

2. The permittee shall determine the VOC content, water content, and density of any material, as applied and as received, using federal Reference Test Method 24. Upon prior written 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 336.1205(3))

AQD Comment: Will consider them to be in Compliance since the facility's paint supplier (Niles Chemical Paint) stated they used that method. Also, they are only using one coating right now as was mentioned previously. In the future should they start using

more coatings again staff stated that they should request approval from the AQD supervisor to use SDS data.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. 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 monitoring/recordkeeping special condition. (R 336.1205(3))

AQD Comment: Appears to be in Compliance.

2. The permittee shall keep the following information on a calendar month basis for FG-Facility:

- 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. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

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

AQD Comment: Appears to be in Compliance with the above.

3. The permittee shall keep the following information on a calendar month basis for FG-Facility:

- a) Gallons or pounds of each VOC containing material used.
- b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
- c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
- d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
- e) VOC 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 and make them available to the Department upon request. (R 336.1205(3))

AQD Comment: Appears to be in Compliance with the above.

4. The permittee shall keep the following information on a calendar month basis for FG-Facility:

- a) Gallons (with water) of each Napthalene (CAS No. 91-20-3) containing material used.
- b) Where applicable, gallons (with water) of each Napthalene (CAS No. 91-20-3) containing material reclaimed.
- c) The Napthalene (CAS No. 91-20-3) content (with water) in pounds per gallon of each material used.
- d) Napthalene (CAS No. 91-20-3) mass emission calculations determining the monthly emission rate in pounds per calendar month.
- e) Napthalene (CAS No. 91-20-3) mass emission calculations determining the annual emission rate in pounds 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 and make them available to the Department upon request¹. (R 336.1225(2))

AQD Comment: Appears to be in Compliance with the above.

Inspection Summary: The facility appears to be in COMPLIANCE with the terms and conditions of PTI No. 82-12 at the present time. Staff thanked Tom and Siva for their time and departed the facility at approximately 12:00 noon.

NAME Matt Dahr

DATE 6-30-21

SUPERVISOR RIL 7/8/21