

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

FY2015 Insp

P041629236

FACILITY: METAL-TECH SYSTEMS INC.	SRN / ID: P0416
LOCATION: 3077 OLD FARM LANE, COMMERCE TWP	DISTRICT: Southeast Michigan
CITY: COMMERCE TWP	COUNTY: OAKLAND
CONTACT: Tisch Gorden, President and Owner	ACTIVITY DATE: 04/03/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of Metal-Tech Systems, Inc. ("Metal-Tech" or "M-tech" or "MTS" or "the company")	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

P0416 - SAR - 2015 04 03

Metal-Tech Systems, Inc. (P0416, aka MCDS Misc-1422)
3077 Old Farm Lane
Plant: Walled Lake
P.O. Commerce Twp., Michigan 48390-1639

VN: AQD issued Violation Notice dated January 24, 2013, for operating the paint spray booth with a couple of filter panels removed (Rules 201 & 910).

On April 03, 2015, I conducted a level 2 self-initiated inspection of Metal-Tech Systems, Inc. ("Metal-Tech" or "M-tech" or "MTS" or "the company") located at 3077 Old Farm Lane, Plant: Walled Lake, P.O.: Commerce Twp., Michigan 48390-1639. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources; and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

During the inspection, Mr. Chris Masters (Phone: 248-960-8160; Cell: 248-318-6755; Fax: 248-960-9825; E-mail: CMasters@mtsGlobal.com), assisted me.

Mr. Robert Thompson (248-960-8160), Forman / Painter, was not present.

Metal-Tech Systems, Inc. (M-tech or MTS) is special machine builder for automotive industry. M-tech does not use any solvent degreaser. Painting is done to paint the metal boxes that house the machines. Steel is received, cut and holes are drilled. There is a small welding machine with no exhaust to outside ambient air.

One 287(c) paint spray booth

M-tech has one 8 ft. W x 8 ft. D * 8 ft. H topcoat paint spray with a back-draft dry filter system. The filtered air from the booth is exhausted to outside air via a vertical discharge stack (about 20 feet tall) with a no-energy-loss rain protection. Alkyd industrial enamel paints are used. Diluent solvents are used to adjust viscosity. Approximately, 10 (<<200) gallons per month of paint is used. HVLP guns are used; sometimes, spray cans are used as well.

AQD issued Violation Notice dated January 24, 2013, for operating the paint spray booth with a couple of filter panels removed (Rules 201 & 910). It appeared that the filters were removed intentionally when air flow reduced as result of increased pressure drop (ΔP) due to paint cake build up on the filters. Instead, the filters should have been replaced. Repeat inspection of May 29, 2013, confirmed that the booth was repaired and all 16 filter panels were installed properly. I asked Mr. Thompson to send a written response to the violation notice. I informed

Mr. Thompson that overspray paint particles could cause property damage (e.g. cars, trucks, etc.) if the filter system was not operated properly.

Again, during the FY 2015 inspection, I found the filter system full of gaps and holes and thus over-spray particulate laden exhaust gases bypassing the filters.

I asked Mr. Masters to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. Tapes (painters, duct, etc.) may be used to cover gaps. I also asked him to keep records of paint and solvent usage according to Rule 336.287(c).

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(c).

Upon keeping paint and solvent usage records and installing and operating the filter system properly, the coating booth meets all of the Rule 336.1287(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

AQD will conduct a follow inspection to ensure continued compliance with proper operation of the booth (Rule 287(c)).

Conclusion

AQD issued Violation Notice for operating the paint spray booth with a couple of filter panels removed (Rules 201 & 910). Defective installation of filters or removing them for air flow concerning the back-draft filter system continues to be a problem.

FYI: VN

January 24, 2013

Mr. Tisch Gorden, President and Owner
Metal-Tech Systems, Inc.
3077 Old Farm Lane
Commerce Twp., Michigan 48390-1639

SRN: P0416 Oaland (63) County

Dear Gorden:

VIOLATION NOTICE

On January 17, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Metal-Tech Systems, Inc. ("MTS" or "Metal-Tech") located at 3077 Old Farm Lane, Commerce Twp., Michigan 48390-1639, Michigan. The purpose of this inspection was to determine MTS's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules.

During the January 17, 2013, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Paint spray booth with a dry filter system (8 ft. * 8 ft.)	Rule 336.1201 (Permit-to-Install)	Metal-Tech installed the Painting Process without obtaining a Permit-to-Install prior to commencing the painting operation. One of sixteen filter panels was completely removed and one additional filter panel was partially removed to facilitate air flow. This is painting without a properly installed and operating control device (dry filter system for paint overspray particulate matter) ^θ
Paint spray booth with a dry filter system (8 ft. * 8 ft.)	Rule 336.1910 (Air cleaning devices)	By removing filter panels, Metal-Tech bypassed the filter system or disabled it. Such an action of tampering, disabling, bypassing an air pollution control device may be a violation of MCL 324.5531.
<p>^θ Alternatively, Metal-Tech may install a coating line that meets all of the Rule 336.1287(c) conditions:</p> <ol style="list-style-type: none"> 1. The coating use rate is not more than 200 gallons, as applied, minus water, per month. 2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system. 3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request. 		

During this inspection, it was noted that Metal-Tech had installed and / or commenced operation of an unpermitted paint spray booth at this facility. The AQD staff advised Metal-Tech on January 17, 2013, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the Paint Spray Booth process equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

If Metal-Tech satisfies Rule 336.1287(c) conditions as stated above, an application for Permit-to-Install is not necessary.

On January 17, 2013, the AQD staff observed operation of Paint Spray Booth while the dry filter system, which arrests paint overspray particles, was malfunctioning as a result of removal of 2 of 16 panels. Proper action is to inspect the filter system periodically and replace filter panels if necessary.

This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited and submit a written response to this Violation Notice by February 14, 2013 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being

taken to prevent a reoccurrence.

If Metal-Tech believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the cited above and for the cooperation that was extended to me during my inspection of January 17, 2013. If you have any questions regarding the s or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Iranna Konanahalli

Air Quality Division
586-753-3741

ISK:VLL

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ

NAME Iranna Konanahalli DATE 04/27/2015 SUPERVISOR CJE