

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

P066048671

FACILITY: SUNRISE WINDOWS & DOORS, LTD.		SRN / ID: P0660
LOCATION: 200 ENTERPRISE DR, TEMPERANCE		DISTRICT: Jackson
CITY: TEMPERANCE		COUNTY: MONROE
CONTACT: Bob Tadsen , Operational Excellence Manager		ACTIVITY DATE: 04/25/2019
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

Minor Source: Scheduled Inspection of Sunrise Windows & Doors Ltd. (P0660)

Facility Contacts:

Bob Tadsen – Operational Excellence Manager

Phone: 734-847-8778 x 0262

Email: btadsen@sunrisewindows.com

Website: sunrisewindows.com

Purpose

On April 25, 2019 I conducted an unannounced compliance inspection of Sunrise Windows & Doors Ltd, located at 200 Enterprise Dr. Temperance, MI. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act, and Permit to Install (PTI) 79-18.

Facility Location

The facility is located in a rural area to the east of a large residential area. See Image 1 for an aerial photo.

Facility Background

Sunrise Windows and Doors, Ltd. Is a window and door manufacturer. They produce high-quality window and doors that are ready for installation.

The facility was issued PTI 79-18 in May of 2018 for a paint booth operation they moved into their Michigan facility from their Ohio facility.

Regulatory Applicability

The facility is currently operating under PTI 79-18 for a vinyl coating spray booth with a dry filter control.

Arrival & Facility Contact

No visible emissions or odors were observed upon my approach to the facility. I arrived at approximately 12:31 PM, proceeded to the facility office to request access for an inspection, provided my identification, and met with Bob Tadsen, the Operational Excellence Manager. A pre-inspection discussion was held with Bob. I informed him of my intent to conduct a facility inspection and to review the various records as necessary. He extended his full cooperation, accompanied me during the full duration of the inspection, and fully addressed my questions.

Pre-Inspection Meeting

I began by talking to Bob about the PTI their facility has for the paint booth they use on site. He was aware of the permit because, as he explained, he was the one who worked on submitting the application. I explained that it was customary for the department to conduct a compliance inspection soon after the issuance of a PTI to ensure that the facility is adhering to the conditions of their permit.

I proceeded to ask Bob about any other processes or equipment that might be located at the facility. He informed me that they do not have any boilers, cold cleaners, or emergency generators, but that they do have an oven

that the painted windows go through to help speed up the drying process.

Bob informed me that the Temperance facility employees approximately 220 people, and that they run 2 shifts, first (6AM-4:30PM) and third (7:30PM – 5:30AM). He said that they only run the paint booth during the first shift, and that about 15%, at most, of the windows they make per day are painted in the paint booth.

Onsite Inspection

Bob proceeded to guide me on a tour of the facility. We started by entering the manufacturing area. The largest part of the manufacturing area is dedicated to assembling the different parts of the window. All processes located here are exhausted indoors.

At the back of the facility is the new addition, which houses the paint booth. The paint booth is completely enclosed, has two stacks dedicated entirely to it (Image 2), and is equipped with a dry filter control. Bob explained that air enters the booth through filters at the top and the ventilation pulls the air through the filters at the bottom to go out the stacks. The paint booth was in operation at the time of the inspection (Image 3), using HVLP applicators.

We then looked at the oven which is located adjacent to the paint booth. It is a natural gas oven that is designed in a similar fashion to the paint booth. It is an enclosed booth with its own exhaust. It was operating at 135 degrees F. I asked Bob about the specifics of the oven, and he said that he would look into it and let me know.

Recordkeeping Review

Attachment 1 shows the SDS provided by Bob for the paint used in the paint booth.

Attachment 2 shows the company's paint usage log for 2019. The facility is operating well below their 500 lb/month VOC limit.

Attachment 3 shows the specifications for the oven.

Post-Inspection Meeting

I held a brief post-inspection meeting with Bob. We discussed the records that would be needed to determine compliance and when they would be expected. We also went over the PTI exemption handbook and discussed the exemptions that relate to the processes that we observed. I explained that the oven may meet an exemption, depending on the specifications of it, and that I would know more when we had more information. We also discussed the paint booth exemption and how that may be an option for them in the future depending on their usage and VOC records.

I thanked Bob for his time and cooperation and departed the facility at 1:22 PM.

Compliance Summary

A review of the rules and permitting history surrounding the oven was conducted with help from the facility's assigned inspector, Diane Kavanaugh Vetort of the AQD, Jackson District Office. It appears that, at the time of permitting, the permit engineer determined the oven to be exempt under Rule 282(2)(b) because the permit writer may have determined the process to be classified as indirect heating. Additionally, since it has such a low operating temperature and it is never operated above 150 degrees F, it could qualify as an air-dried coating oven. Therefore, at the time of this inspection, this equipment is considered exempt under 282(2)(b). The application evaluation of PTI 79-18 is located in the facility's file.

Based upon the facility inspection, review of the records, and review of applicable requirements, the company was found to be in compliance at the time of this inspection.

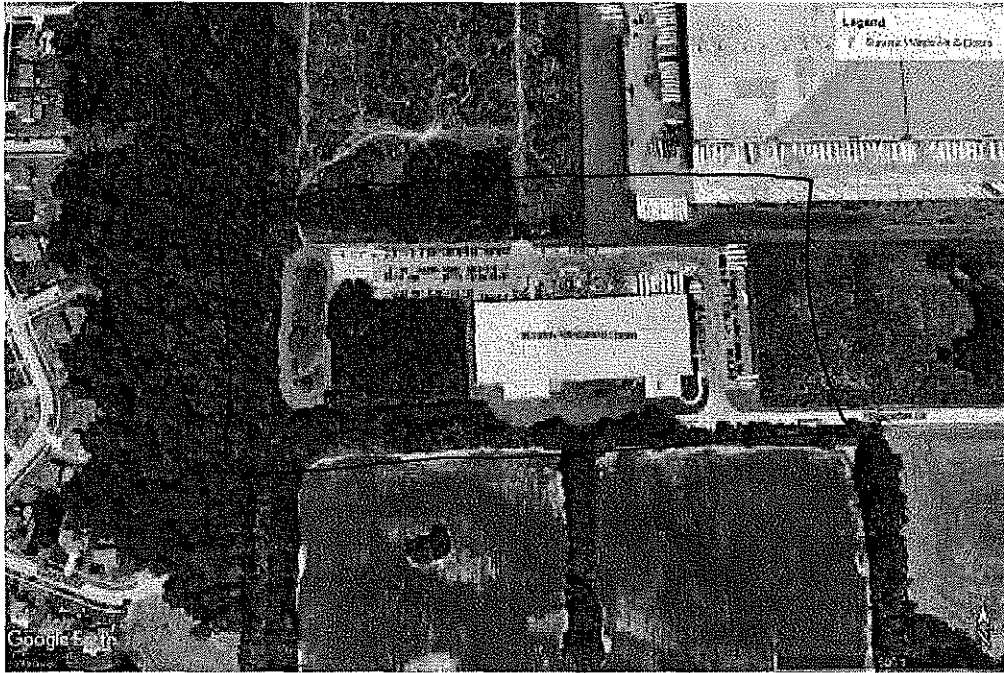


Image 1(1) : Aerial view

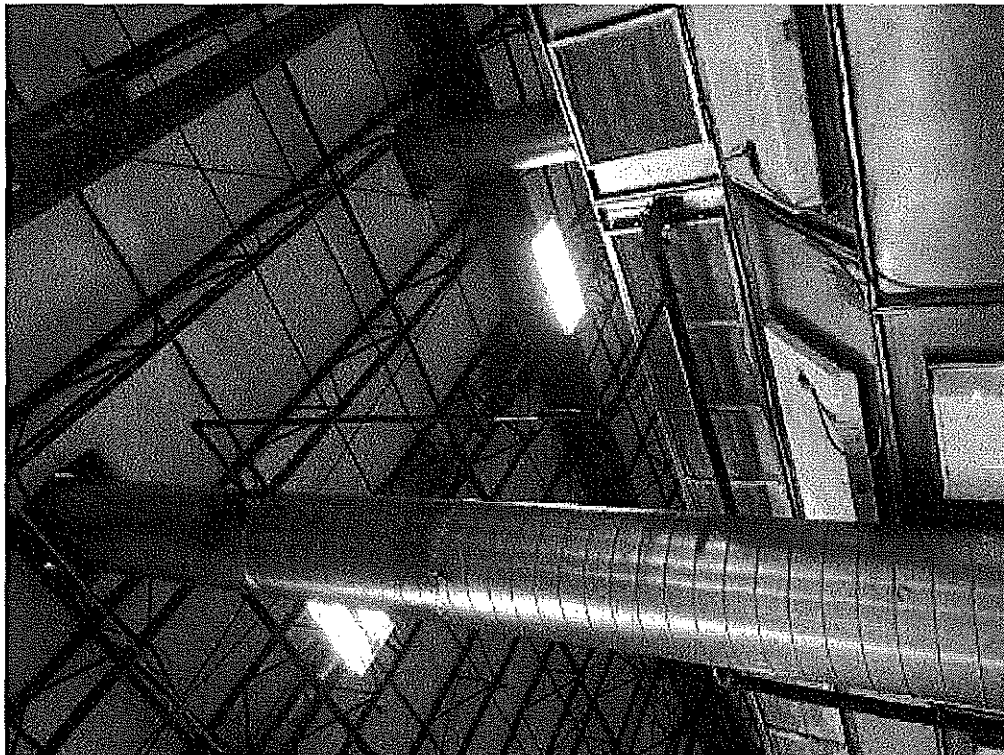


Image 2(2) : Paint booth exhaust



Image 3(3) : Interior of paint booth

NAME Stephen Wilson

DATE 5.1.19

SUPERVISOR [Signature]