

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

P079038744

FACILITY: Fletcher Precision Machine Painting, Inc.		SRN / ID: P0790
LOCATION: 6795 E. 9 Mile Road, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Terry Fletcher, Owner		ACTIVITY DATE: 02/02/2017
STAFF: Kerry Kelly	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Complaint investigation and self-initiated inspection		
RESOLVED COMPLAINTS: C-17-00683, C-17-00808		

On February 2, 2017 I (Kerry Kelly) conducted an unannounced inspection of Fletcher Precision Machine Painting, Inc. located at 6795 E. 9 Mile Road, Warren, Michigan. This facility is identified by the State of Michigan with the State Registration Number (SRN) P0790. The purpose of this inspection was to investigate two odor complaints (C-17-00683 and C-17-00808) and to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the administrative rules.

FACILITY OVERVIEW

Fletcher Precision Machine Painting, Inc. is a coating facility located in southern Macomb County, Michigan. There are commercial/industrial building properties to the immediate south, west, and east of the facility and residential properties immediately north of the facility. The closest residential property is approximately 30 feet north of Fletcher Precision Machine Painting, Inc.

COMPLAINT INVESTIGATION

I arrived in the vicinity of Fletcher Precision Machine Coating, Inc. at approximately 3:00 PM. It appeared the facility was operating when I arrived. During the investigation, the sky was clear, the temperature was 25 degrees Fahrenheit, and the wind was from the west at approximately 16 MPH according to weather.com. Odor observations were conducted upwind and downwind of Fletcher Precision Machine Painting, Inc. between 2:59 PM and 3:14 PM.

UPWIND

I conducted an odor observation approximately 500 feet west of Fletcher Precision Machine Painting, Inc. at Sherwood Ave. in the alley just north of E. 9 Mile between 3:01 PM and 3:03 PM. The purpose of the upwind odor observation was to determine if a source upwind of Fletcher Precision Machine Painting, Inc. could be the source of the odors described by the complainant I did not detect odors upwind of Fletcher Machine Painting, Inc.

DOWNWIND

Odor observations were conducted at four locations downwind of Fletcher Precision Machine Painting, Inc. At 2:59 PM I detected definite and distinct paint-like odors approximately 190 feet east of Fletcher Precision Machine Painting, Inc. on Memphis Ave. just north of E. 9 Mile Road. Definite and distinct odors were also detected approximately 3 feet north of Fletcher Precision Machine Painting, Inc. between 3:03 PM and 3:04 PM. No odors were detected on Paige Ave between Memphis Ave and Peters Ave., north-northeast to east-northeast of Fletcher Precision Machine Painting, Inc., from 3:05 PM and 3:07 PM. Just barely detectable, intermittent paint-like and food odors were detected approximately 860 feet east-southeast of Fletcher Precision Machine Painting, Inc. at the corner of E. 9 Mile Road and Peters Ave between 3:07 PM and 3:14 PM.

The level of odors observed during the investigation were not of sufficient intensity, duration, or frequency to warrant a violation notice. Complaints C-17-00683 and C-17-00808 are considered resolved and additional complaints or information is necessary before further action, with regards to odors, can be taken. Following the odor observations, I conducted a self-initiated inspection.

INSPECTION

Upon entering Fletcher Precision Machine Painting, Inc., I introduced myself, showed my photo credentials, and stated the purpose of my visit to Ms. Julie Fletcher. According to Ms. Fletcher, Fletcher Precision Machine Painting operates from 7:00 AM until 3:00 PM Monday through Friday. Ms. Fletcher called Mr. Terry Fletcher, Owner, to assist me during the inspection. Mr. Fletcher escorted me during the inspection.

Mr. Fletcher explained that he began operations at 6795 E. 9 Mile Road, Warren, Michigan approximately September or October 2016. The equipment at Fletcher Precision Machine Painting, Inc. was moved from 22600 Sherwood, Warren, Michigan (SRN A3267) where it was permitted by PTI 135-84.

I inspected two coating lines and an empty parts washer at Fletcher Precision Machine Painting. Metal parts

cleaning also takes place at this facility. The equipment at Fletcher Precision Machine Painting is used to clean and coat robots and parts for ABB Robotics.

Mr. Fletcher stated parts are cleaned prior to painting. Two to three barrels of cleaner are used per month, according to Mr. Fletcher, because the parts they clean are very large. Mr. Fletcher showed me a metal frame approximately 3 feet x 3 feet x 3 feet as an example of the size of parts cleaned and coated at the facility. Cleaning was not taking place during the inspection. I asked Mr. Fletcher to provide Safety Data Sheets (SDSs) for the cleaners and records of the cleaner use each month. I also requested Mr. Fletcher provide the SDSs and monthly usage for the coatings. Mr. Fletcher stated the records were being reformatted at ABB and he would send them to me. I asked Mr. Fletcher, via email, to provide the records by Friday, February 9, 2017 (see attachment 1). The SDSs were provided by Mr. Fletcher on February 8, 2017 (see attached disc). Xylene, a hazardous air pollutant (HAP), was one of the SDSs provided by Mr. Fletcher. Autumn Fletcher sent an email on February 10, 2017 stating she would begin, the following week, scanning the coating and solvent use records for July-ish 2016 - January 2017 (see attachment 2). I sent an email on February 10, 2017 asking Mr. Fletcher what the xylene is used for (see attachment 3). As of February 21, 2017, I had not received coating and solvent use records or an answer to the question about xylene. I called Mr. Fletcher on March 1, 2017 to ask him about the xylene use. In this phone call Mr. Fletcher stated the xylene was used to clean parts that will be coated with water-based paint. To clarify what size container Mr. Fletcher considered to be a barrel, Mr. Fletcher said he considered a barrel to be a 55 gallon drum, but didn't remember saying he used 2 - 3 barrels of cleaner a month. Instead, Mr. Fletcher said he may have meant he used two to three 55 gallon drums since he moved to this facility in July 2016. The potential to emit for HAPs from the facility is currently unknown and, as a result, a determination has not been made as to whether the facility is prohibited by R 336.1278(2) to be exempt from the requirement to obtain a permit to install, pursuant to R 336.1285(r)(iv), for the cleaning process. In addition, the records required in R 336.1278(a) to be eligible for a specific exemption, were not provided.

The exhaust system for each paint booth was supplied with dry filter controls that appeared to be properly installed. During the inspection, painting was taking place outside one of the paint booths in an area enclosed with plastic tarp on three sides and extending to the paint booth opening. Mr. Fletcher stated the paint booth is used for sanding, that is why painting is being done outside the paint booth. I informed Mr. Fletcher R 336.1287(2)(c) requires the filter system serve only the painting operations. Mr. Fletcher said they will discontinue sanding in the paint booth and were planning on replacing the plastic tarps with sheet metal. There were parts hanging on racks outside the second booth in another plastic tarped area. There are two ovens associated with the coating booths. One of the ovens is used to cure painted parts, the other oven was not connected to duct work and Mr. Fletcher said it was not being used. The drying ovens are considered part of the coating line according to the R336.1103(k). Waste paint and solvent was stored in closed containers. I asked Mr. Fletcher for coating usage records, required in R 366.1287(2)(c), to demonstrate exemption from the requirement in R 336.1201 to obtain a permit to install for the paint booths. As of March 6, 2017, the AQD has not received coating use records. In addition, the potential to emit for HAPs from the facility is currently unknown and, as a result, a determination has not been made as to whether the facility is prohibited by R 336.1278(2) to be exempt from the requirement to obtain a permit to install, pursuant to R 336.1287(2)(c), for the painting process. It appears Fletcher Precision Machine Painting, Inc. is in violation of R 336.1201 for installing two coating lines without first obtaining a permit to install. A violation notice was issued to Fletcher Precision Machine Painting, Inc. on February 21, 2017.

There is one empty parts washer at Fletcher Precision Machine Painting, Inc. I inspected the cold cleaner, which had an air/vapor interface of approximately two square feet, located in the upstairs storage area at Fletcher's. During the inspection the lid to the cold cleaner was closed and written procedures for operation were posted on the washer. It appears the cold cleaner is in compliance with R336.1707- Emission Limitations and Prohibitions for New Cold Cleaners. The potential to emit for HAPs from the facility is currently unknown and, as a result, a determination has not been made as to whether the facility is prohibited by R 336.1278(2) to be exempt, per R336.1281(2)(h), from the requirement to obtain a permit to install for the cold cleaner.

With respect to the noise and odor complaint, Mr. Fletcher mentioned he was considering putting a barrier around the stack to mitigate noise. To alleviate odors from settling in the alley between Fletcher Precision Machine Painting Inc. and the backyards of residents, Mr. Fletcher said he would be willing to add a section to the paint stack. Based on my observation of the stack, it appears the stack is approximately one and one half times the building height. However, the stack height was not verified through measurements.

CONCLUSION

Based on this inspection, it appears Fletcher Precision Machine Painting, Inc. is in violation of R 336.1201 for installing two coating lines without first obtaining a permit to install. The cleaning process and cold cleaner may also require a permit if the source's potential to emit is greater than the major source threshold or the potential to emit is not evaluated for the source. A violation notice was issued to Fletcher Precision Machine Painting, Inc. on February 21, 2017 for installing two paint booths without obtaining a permit to install.

NAME K. Kelly

DATE 3/7/17

SUPERVISOR SK

