

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

P079063631

FACILITY: Fletcher Precision Machine Painting, Inc.		SRN / ID: P0790
LOCATION: 6795 E. 9 Mile Road, WARREN		DISTRICT: Warren
CITY: WARREN		COUNTY: MACOMB
CONTACT: Terry Fletcher , Owner		ACTIVITY DATE: 07/14/2022
STAFF: Kaitlyn Leffert	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2022 Inspection		
RESOLVED COMPLAINTS:		

On July 14, 2022, Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff, Kaitlyn Leffert, conducted an inspection of Fletcher Precision Machine Painting (SRN: P0790) located at 6795 E. 9 Mile Road, Warren, MI. The purpose of the purpose of the inspection was 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, as amended (Act 451); the administrative rules; and Permit to Install (PTI) Number 161-17.

Fletcher Precision Machine Painting is a metal coating facility that is permitted to operate two coating booths and solvent cleaning operations for preparation of materials for coating. The permit limits emissions of acetone from the solvent cleaning process and volatile organic compounds (VOCs) from the two coating booths. During the FY2021 inspection, Fletcher Precision was found to be in exceedance of their acetone emission limit (EUSOLVENT Condition I.1) and to be using cleaning solvents that contain VOCs or HAPs (EUSOLVENT Condition II.1).

On July 12th, I visited Fletcher Precision Machine Painting (Fletcher Painting) to conduct an inspection. I arrived at the facility and was greeted by Terry Fletcher, owner, Fletcher Painting. He explained that he was about to head out, so I offered to re-schedule for later that week. We re-scheduled the inspection for Thursday, July 14th. Before I left, he quickly walked me through the facility. He noted that operation of the paint booth has significantly decreased. I noted that the coating booths were not currently in operation at the time of my visit. I thanked him for his time, said I would be back Thursday for my full inspection, and departed the site.

I arrived on-site around 10:00 am on July 14th and was again greeted by Terry Fletcher. We first met in the office area to discuss the purpose of my inspection and go over the requested records. I was provided copies of the Paint/Solvent Tracking log maintained by the facility. These logs identify the date a material was used, the type of paint or material used, the amount used in gallons.

Fletcher Precision Painting operates Monday through Friday, from 7:00 am to 3:00 pm. The facility is permitted to operate two coating booths. One of the coating booths is now used solely as a prep station and is no longer used for coating. The other coating booth is still in operation, although at a decreased capacity. The facility also has a curing oven, which is no longer used. As noted during last year's inspection, the curing oven is secured shut with a lock to prevent its use. Coated parts are air dried instead.

Metal parts are prepped for coating by cleaning with acetone. Last year, the facility had switched to the use of VOC and HAP-containing cleaning solvents, which was a violation of PTI No. 161-17, EUSOLVENT, S.C. II.1. The facility has returned to only using acetone and does not use any solvents that contains HAPs or VOCs.

While on site, I noted that all acetone and coatings, including waste materials, appeared to be stored in closed containers to minimize fugitive emissions, as required by EUSOLVENT, S.C. III.1 and 2, as well as FGRULE621, S.C. III.1 and 2.

Acetone emissions at the facility are limited to 150.3 pounds per year, as determined on a 12-month rolling basis (EUSOLVENT, S.C. I.1). Fletcher Precision is required to maintain records of acetone usage and emissions calculations (EUSOLVENT, S.C. V.2). I was provided copies of purchase records for acetone but was not provided acetone emissions calculations. Therefore, the facility is in violation of PTI No. 161-17, EUSOLVENT, Condition VI.2.

The facility maintains records of coating using on a daily and monthly basis, as required by FGRULE621, S.C. V.2. Coating usage is limited to 10 gallons per day (S.C. II.1). Copies of the provided records indicate that the facility typically uses coating around 10 days per month, and that total daily coating usage when the facility operates typically ranges from 1 to 6 gallons. The provided daily paint tracking records indicates that the facility is operating in compliance with the permitted daily coating usage.

Emissions of VOCs from both coating lines, including prep stations, are limited to 9.8 tons per year (tpy) and 2,000 pounds per month (FGRULE621, S.C. I.1 and I.2). The facility was unable to produce VOC emissions calculations, which is required by FGRULE621, S.C. VI.2. Fletcher Precision will be issued a violation notice for failure to maintain VOC emissions calculations.

Conclusion

During my inspection, Fletcher Precision was found to not be maintaining emissions calculations of acetone or VOCs. The facility will be issued a notice for violation of PTI No. 161-17, EUSOLVENT, Condition VI.2 and FGRULE621, Condition VI.2.

NAME 

DATE 10/07/2022

SUPERVISOR 