

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

P098350483

FACILITY: FALCON RME, LLC		SRN / ID: P0983
LOCATION: 2600 W SALZBURG ROAD, AUBURN		DISTRICT: Saginaw Bay
CITY: AUBURN		COUNTY: BAY
CONTACT: Jim Jurgens , VP of Operations		ACTIVITY DATE: 09/05/2019
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Inspection of new facility		
RESOLVED COMPLAINTS:		

On September 5, 2019, Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (AQD) conducted an inspection of Falcon Asphalt Repair Equipment. The facility contact was Mr. Jim Jurgens, VP of Operations. The company began operation in 2004. The company was originally located on Waldo Rd in Midland and moved to a couple of locations before building a new facility at the NW corner of Salzburg and Flajole Rds in Bay County. The facility was issued air use permit 203-18 on December 18, 2018.

The company makes the small sized equipment used to repair holes in asphalt pavement. Jim said municipalities are its primary customers. Falcon is the largest company in its industry group. The company does not use prefabricated metal parts. It receives steel in various sizes and shapes. It then fabricates parts through cutting, drilling, and welding. The fumes from the metal fabrication area are routed outside into a baghouse and the air returned inside. Each unit is then hand assembled as required. Falcon does fulfill custom orders to accommodate the customers needs. Prior to being painted the units are placed into a blast booth. The blasting operation uses glass. The booth exhaust is routed to a cartridge style collector. I mentioned to Jim he may want to consider installing a drop box prior to the collector. The drop box could then facilitate dropping out a large amount of material thereby preserving the filters in the collector. Jim said he was discussing that very topic earlier in the day. Jim said the blasting serves a twofold purpose. The primary function is to create a tiny bit of roughness on the surface so the coatings have improved adhesion. It also provides some cleaning of the metal. No pre wash or spray cleaning is conducted. Since the permit is a general coatings line permit, the blasting area is not covered. Additionally, due to the use of glass it would technically not be able to be exempt from permitting. Rule 285 I vi does not specifically list glass in the list of blasting material. It also makes reference to use of a drop box if metal is being cleaned.

The actual coating occurs in two lines. The lines run east to west and each is comprised of a prime booth, a drying area, and then a topcoat booth. Ovens are not used to dry or cure the painted products. Two separate paint kitchens are used. HVLP spray guns are used to apply the coatings. Jim admitted the booth numbering system is a bit confusing. Line 1 is the primary coating line but has booths 2 and 4. It is the northerly line. Line 2 is comprised of booths 1 and 3 and it located to the south of Line 1. The guns are placed in small holders that allows the guns to be cleaned when not is use or between color changes. This helps to cut down on solvent usage. The primer is a urethane while the topcoat is an epoxy. Booth filters were in place.

After the coating is completed, the units can proceed to any one of a number of racks. The racks can raise the units to facilitate final assembly of lights, controls etc. This final step is a completely new one by Falocn which enables the employees to have better access to each unit thereby making their work easier.

We then went into Jim's office to review records. The permit limits each coating line to 2,000 pounds of VOC per month and 10 tpy based on a 12 month rolling time period. The entire source has an overall VOC limit of 30 tpy. Jim had monthly records of paint usage but they did not include the primer or the MEK used as solvent. Additionally, the records were not being conducted on a 12 month rolling time period. I told Jim to make the corrections and provide an update.

I also provided Jim information about the National Emissions Standards for Hazardous Air Pollutants (NESHAP) XXXXXX for nine metal fabrication and finishing source categories at area sources. The AQD does not have delegation to enforce the regulation.

As of September 19, 2019 Jim said he added the primer and MEK but did not yet have the 12 month rolling time period records. Given the absence of records, a compliance determination regarding limits can not be made. Due to the relatively small size of the equipment being coated and overall low production volume, it is doubtful limits are being exceeded. However, the records do need to be checked to ensure calculations are being done correctly.

NAME B. ZentropDATE 9-22-19SUPERVISOR C. Hove