

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

B236354725

<b>FACILITY:</b> Standard Coating Inc.		<b>SRN / ID:</b> B2363
<b>LOCATION:</b> 32565 Dequindre, MADISON HTS		<b>DISTRICT:</b> Warren
<b>CITY:</b> MADISON HTS		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Nino Nuculovic , General Manager		<b>ACTIVITY DATE:</b> 07/29/2020
<b>STAFF:</b> Joe Forth	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Virtual Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On July 29, 2020, AQD staff Joseph Forth conducted a scheduled inspection of Standard Coating Inc. located at 32565 Dequindre Rd, Madison Heights, Michigan (SRN B2363). The purpose of this inspection was 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); the administrative rules; the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63 Subpart M); Michigan Department of Environment, Great Lakes and Energy (EGLE-AQD) Administrative Rules, and Renewable Operating Permit (ROP) No. MI-ROP-N2363-2019.

Standard Coating Inc. applies epoxy coating to metal parts for use in the automotive industry. The facility employs approximately 70 employees, operates Monday through Friday (occasionally Saturday) from 7:00 am to 5:00 pm. They have a surface coating line including: a phosphate treating system, rinsing process, and coating process with two dip tanks and a natural gas-fired curing oven. The facility also has two boilers, one 5,000,000 BTU (EUBOILER2) and one 8,000,000 BTU (EUBOILER5). 40 CFR Part 63 Subpart M regulates the rate and concentration of organic HAP. In 2004, the EPA delisted ethylene glycol monobutyl ether (CAS 111-76-2), which appears to eliminate the permitted organic HAP requirements for this source because ethylene glycol monobutyl ether was the only organic HAP used at this facility. Therefore, Standard Coating appears to be in compliance with the permitted organic HAP special conditions for EULINE9 (I.3-10, II.2, VI.4-8, VII.4-7, IX.1). Standard Coating was issued a violation notice for strong odors relating to their e-coat process in February 2020. The facility responded to the VN with their plans to remediate the issue (additional cleaning, adjusting oven temperature, and are still considering a fresh air intake and extending the stacks). The AQD has not received another complaint since, so unless further complaints are received, the violation is considered resolved.

The inspection was conducted virtually and started at 10:00 am. I spoke with Nino Nuculovic, General Manager. We discussed the conditions of the permit the necessary records. Mr. Nuculovic then showed me the permitted equipment. He showed the coating line and curing oven. I was shown the boilers which appeared to be in satisfactory condition at the time of inspection, no significant rust. Mr. Nuculovic went on the roof to show the exhausts of the processes, it appeared that the exhausts were not opaque (visible emissions not able to be properly assessed while not present in person). The rest of the building is used for storage/shipment purposes.

I thanked Mr. Nuculovic for his time and concluded the inspection.

### Compliance

MI-ROP-B2363-2019

All records were provided electronically and can be located in: S:\Air Quality Division\STAFF\Joe Forth\B2363 Standard Coating FY20 Inspection

**EULINE9**

**I.1 The month with the highest VOC per hour since last inspection was in May 2020 at 7.92 lbs/hour of operation. This is in compliance of the permitted limit of 8.00 lbs VOC/hr.**

**I.2 The 12-month rolling time period of September 2019 to August 2020 showed an emission of 6.37 tons of VOCs.**

**II.1 The facility provided SDS to confirm the VOC content (minus water) of the water based coatings used. All water based coatings appear to be under 1.30 pounds VOC/ gal (minus water).**

**II.2 The facility does not use any thinners or additives.**

**II.3 The facility only uses Cleaner HF-2, which does not contain any HAPs (SDS provided).**

**V.1 The permittee received permission to use manufacturer data in lieu of performing Method 24 analyses.**

**VI.1 The permittee provided a current listing/usage sheet of all materials used in EULINE9, along with SDSs for each material.**

**VI.2a&e The permittee provided monthly coating (with water) and reducer usage records.**

**VI.2b-d&f VOC contents of the materials used in EULINE9 are stated both on the calculations and in the manufacturer information/SDS.**

**VI.2g Operating hours for EULINE9 listed with VOC calculations.**

**VI.3 The permittee provided monthly calculations for the following: average hourly VOC emission rate, total monthly VOC emission rate in tons, and 12-month rolling total of VOC emissions in tons.**

**VII.1-3 The permittee submits both annual and semi-annual ongoing compliance reports. Recent reports have no deviations reported.**

**VIII.1-3 The exhaust stacks for EULINE9 appear to discharge vertically and unobstructed. Stack dimensions not confirmed during this inspection.**

**FGBOILERS**

**II.1 The permittee only uses natural gas as fuel for FGBOILERS.**

**III.1 The permittee provided records of the one-time energy assessment required by 40 CFR 63 Subpart DDDDD.**

**III.2 The permittee performs the required tune-ups for EUBOILER2 and EUBOILER5. The permittee provided copies of the tune-up records.**

**III.3 The permittee has not chosen an alternate way to satisfy work practice standards aside from III.1 and III.2, so this condition does not apply.**

**III.4 The facility provided tune-up records for EUBOILER2 from 2017, and 2018 during last year's inspection. The facility is required to tune-up this boiler every 61 months.**

**III.5 The facility provided tune-up records for EUBOILER5 from February 2020. The**

facility is required to do so every 25 months.

**III.6** The tune-up records appear to satisfy the requirements stated in condition IX.4a-f.

**III.8** Initial boiler-tune ups were performed at the issuance of the previous ROP in 2014, before the January 31, 2016 deadline.

**III.9** The permittee has completed the one-time energy assessment required by 40 CFR 63 Subpart DDDDD.

**VI.1** The permittee was able to provide records of tune-ups and required notifications and report required by 40 CFR 63 Subpart DDDDD.

**VI.2** All records for FGBOILERS were available upon request.

**VII.1-2** The facility reported no deviations.

**VII.3** The permittee submits the required annual and semiannual compliance reports.

**VIII.4** The permittee submitted an initial Notification of Compliance for each boiler. The reports were received by AQD on March 4, 2014 before the January 31, 2016.

**VII.5** The permittee has submitted the follow up ongoing Notification of Compliance reports for EUBOILERS 2 and 5.

**VII.6** The permittee has included company info, process unit info, reporting period dates, tune-up dates, and responsible official completeness statements in the compliance report.

**VII.7** The permittee submits deviation and fuel use summary reports to the EPA.

**IX.1** The permittee has complied with initial compliance requirements for 40 CFR 63 Subpart DDDDD and has submitted ongoing Notification of Compliance Reports.

**IX.2** The permittee appears to be in compliance with the work practice standards described in 40 CFR 63.7505(a) by performing the tune-up maintenance on the boilers.

**IX.3-4, and 6** Neither boiler in FGBOILERS has experienced a lapse in operation to warrant completion of additional tune-ups.

**IX.5** The permittee keeps records to demonstrate continuous compliance with tune-up requirements.

The permittee appears to be in 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); the administrative rules; the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63 Subpart MMMM); Michigan Department of Environment, Great Lakes and Energy (EGLE-AQD) Administrative Rules, and Renewable Operating Permit (ROP) No. MI-ROP-N2363-2019.

NAME *Joseph M. Furt*

DATE 9-28-2020

SUPERVISOR *Sebastian Kallumkal*