

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

A164067909

FACILITY: Loc Performance Products		SRN / ID: A1640
LOCATION: 1600 N LARCH ST, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Jessica Johnson , Corporate Quality		ACTIVITY DATE: 06/13/2023
STAFF: David Rauch	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: An unannounced routine inspection of the facility was conducted to determine compliance with PTIs 123-18, 157-18, 309-07.		
RESOLVED COMPLAINTS:		

On June 13, 2023 the State of Michigan's (SOM), Environment Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted a routine inspection of Loc Performance. The facility location is at 1600 Larch Rd in Lansing, MI.

The Environmental Contact:

Jessica Johnson Corporate Mgmt-Systems Manager; jjohnson@locper.com. 810-874-1794

Facility Description:

This facility creates metal parts for military purposes. The facility paint and coats the metal parts made on site or refurbishes parts that were sent to them as recycled equipment.

Regulatory Overview:

This facility is classified as an Opt-Out source due to their production of VOC's and HAPs being higher than a minor source but not high enough to be considered Major. The facility has 3 PTI's that cover the plants general processes and regulate the emissions from the site.

Emission Units:

Emission Unit or Flexible Group	Description	Permit or Exemption	# of Units	Compliance
FG-Coating	One or more coating lines and all associated purge and clean-up operations. As well as ovens.	PTI 123-18	6	Yes
FG-Source	All coating lines and exempt coating equipment	PTI 123-18	6	Yes
EU-MetalParts	Miscellaneous metal parts paint spray and associated ovens.	PTI 309-07	6	Yes
FG-Facility	All process equipment source-wide, including equipment covered in other	PTI 157-18	179 units	Yes

	permits and grand-fathered equipment, and exempt equipment.		listed below	
Shot Blast	Shot Blast cabinets.	285 (I)(v)(i)(c)	3	Yes
Metal Cutting	Water cutting and plasma cutting units.	285(I)(vi)	15	Yes
Welding Units	Welding Stations and equipment throughout Source	285(I)(vi)	111	Yes
CNC/Milling Units	CNC machines and milling machines throughout Source	285(I)(vi)	40	Yes
Grinding Units	Grinding machines throughout the Source	285(I)(vi)	5	Yes
Presses	Large and Small presses used to bend metal.	285(I)(i)	5	Yes

Facility History:

This facility was previously Demmer Corp and was bought by Loc Performance in 2017. Loc Performance currently has 3 active PTI's. In 2018 Loc was permitted under PTI 157-18. The facility adopted the PTI from Demmer Corporation 309-07. The facility was also given a general permit 123-18 for FG-Facility VOCs.

Inspection:

Arrived at the facility at 9:00AM, part of the delay on-site was parking in the wrong lot and having to be directed to the correct lot. Parking for the facility is on Larch St in front of the building. Once I entered the proper door I had to sign in and wait in a waiting room until staff was able to see me. When I arrived, the environmental staff was all in the Plymouth location and was not on-site. The other building staff who would have been available were all in meetings and unable to be on site. While waiting I was given a conference room to wait for the appropriate staff to arrive. At 11:00am the appropriate staff arrived, and the inspection was able to commence. I was greeted by Jessica Johnson who is the Environmental Manager for Loc Performance. She was accompanied by Cheri Knickerbocker the Environmental Administrator and Joe Atkinson an environmental intern. All three accompanied me through the tour of the facility.

The facility is very large and does a variety of metal working projects. When walking into the general plant area I observed multiple CNC machines with metal shaving piles which Jessica stated are recycled and used for new parts. The CNC machines were used to make specialty parts for the military vehicles made on site. The facility has approximately 40 CNC machines on site ranging in sizes and tasks. The CNC area has a large belt moving the coolant and shavings to a bin where the shavings are held in bins. From the CNC machines we entered an area with break presses that bend and warp the metals into specific shapes for the needed vehicle. There were five total presses but two of the presses were considered to be some of the largest in the United States.

Throughout the plant there are numerous welding stations and each one is equipped with various controls for the equipment. The welding stations also vary in what is performed throughout the building. There is also a room at the back of the facility near the vending machines where they do welding and test welds that are made. Some of the welding stations have controls and others emit into the open air of the facility. There are over 100 different pieces of welding equipment used at this facility from welding tools to controls. There is also a section of the building where AQD staff was asked not to enter due to prototypes that are in the works. Per Jessica there are no emission units in this area.

In the back of the facility the large paint booth, and cutting machines are maintained for creating vehicles and coating them. The facility has a large plasma cutter that is housed in a special unit and has a very large water jet cutting unit used to cut larger thick panels of steel. The water cutter was not operating during the inspection but the jet system vented internally.

The paint booths were vented properly into a filtered space but were not being drawn into the thermal oxidizer. The facility no longer uses a thermal oxidizer as it was not cost effective, and production did not meet the need for using an oxidizer. The facility is currently running uncontrolled emissions, but they are below the need for a control device. The paint booth was also not operating during the inspection. The facility was not running either paint line while the inspection was occurring. The filters in the paint booth were inserted properly and were not overly covered in paint. The overall paint booth was clean and maintained.

Down the road from the main building was a secondary building that housed the smaller paint line and wood shop area. The wood shop is used for internal parts in the facility and not for production. The paint line was not in use but was properly maintained. There were two other small paint rooms used for touch ups that were also not in use.

Across from the second building is a small storage building used for holding hazardous waste on site. There were only a few barrels at the time of the inspection and the barrels are held for 90 days before they are discarded.

Review of PTIs:

PTI 309-07:

This permit covers the large paint booth and oven located across the street at the McKinley building. This unit has not been in use for several years and is no longer planned to be in use. During the inspection it was not in use and had miscellaneous items in the booth but not painting materials.

The facility is not currently using the carbon absorber as the paint booth is not in use.

PTI-123-18

This permit covers the general coating process at the facility. The facility does not currently use the RTO system due to the cost being more than the actual unit controls emissions. The facility does not produce enough emissions to make the RTO a viable control. The facility is well under the emission limit of 30tpy for the rolling average. The facility has not been using the purge or cleaning solvents, records for solvents is a rolling average of 0.0 since 2021. Facility does still maintain records of all paints used and the SDS forms from the manufactures.

VOC Limit for the permit is 30tpy and the facility is currently at 0.459 tons. This is under the emission limits set in the permit.

PTI 157-18

This is an Opt-Out permit for the facility and sets the facility HAPs Individual Limit at 9.0tpy and the Aggregate HAPs at 22.5tpy for a 12-month rolling average. The facility maintains records of the HAPs materials and is currently at 0.26tpy rolling, well below the allowed average.

Fee Status:

This facility is an opt-out source for HAPs and VOCs and is a Fee Category E in MAERS.

Location:

This facility is located at 1600 N Larch St in Lansing in Ingham County. The facility is East of Old US 27 and the main entrance is located at the intersection of E North St and N Larch St. To the East of the facility is a residential area with neighborhoods. To the North and South of the facility there is industrial buildings and different businesses. West of the facility is business and residential properties. Parking for this facility is on the corner of North St and Larch St.

Facility Record Keeping:

Equipment	2021 Emissions lbs (tons)	2022 Emissions lbs (tons)	2023* Emissions lbs (tons)
Sm-Coating Line	3,940 (1.97)	1240 (0.62)	1.88 (0.00094)
LG-Coating Line	1,240 (0.62)	4,980 (2.49)	445.84 (0.22292)
Maynard Line	0.00	4,320 (2.16)	469.44 (0.23472)
VOCs Total Tons	2.59	5.27	0.459

Sm-Coating Line	2,280 (1.14)	317 (0.15)	5.38 (0.00269)
LG-Coating Line	760 (0.38)	840 (0.42)	376.25 (0.188125)
Maynard Line	0.00	560 (0.28)	142.68 (0.07134)
HAPs Total Tons	1.52	0.85	0.26

*= current emissions through the month of May

Conclusions:

Upon review of the facility records as well as the onsite inspection this facility is in compliance with the PTIs 309-07, 157-18, 123-18. There were no violations to report at this time, the facility has not had an issue with the last inspections that occurred on site. The facility has provided all records for each process they do on site.

NAME David Rauch

DATE 07/14/2023

SUPERVISOR RB