

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

B881551751

FACILITY: Highland Tank		SRN / ID: B8815
LOCATION: 4701 White Lake Rd, CLARKSTON		DISTRICT: Southeast Michigan
CITY: CLARKSTON		COUNTY: OAKLAND
CONTACT: Chad O'Brien, General Manager		ACTIVITY DATE: 11/26/2019
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection to verify the fiberglass coating process is removed		
RESOLVED COMPLAINTS:		

On Tuesday, November 26, 2019, I, Michigan Department of Environment, Great Lakes and Energy - Air Quality Division (EGLE-AQD) staff Sebastian Kallumkal conducted a self-initiated inspection of Highland Tank (previously Clawson Tank Company) located at 4701 White Lake Road in Clarkston, Michigan. The purpose of the inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the conditions of Permit to Install (PTI) No. 546-96 and to verify that the fiberglass lay-up process has been disconnected/dismantled from the facility.

At the facility, I met Mr. Chad O'Brien, General Manager, and Lee Lessenthien, Supervisor. I introduced myself, presented my credentials and stated the purpose of my inspection. They accompanied me for the inspection. Owner of the previous facility, Clawson Tank, Mr. Robert Harding had informed AQD that Clawson Tank Company was sold to Highland Tank and they had ceased the fiberglass lay-up operations.

Highland Tank manufactures shop-fabricated steel for chemical storage and process (mixing). It manufactures both aboveground and underground tanks. These tanks range in size from 5000 to 30,000 gallons.

I visited the building where the fiberglass lay-up operations were conducted. I observed that all the equipment associated with this operation had either been removed or disconnected. PTI No. 546-96 is solely associated with this process. This permit would be voided.

Next, we visited the tank manufacturing building. The manufacturing process includes rolling/forming raw steel to the tank diameter, welding, pressurizing and testing for leaks using soap solution in water, and sand blasting. After this, the tanks may be shipped as finished product or coated with paint. 90% of the paint used are water-based.

The machine shop houses large steel fabrication equipment including a hole punch, shear, burn table, and press brake, which all exhaust indoors. The equipment appears to be exempt from permitting requirements via R 285(2)(l)(vi)(B).

Carbon Steel arrives in flat sheets. In the fabrication area, a large rolling machine loops the flat steel into the desired diameter shaft for the tank, and these tubes are welded together to a desired length. Similarly, the curved heads of the tank are rolled up in the fabrication area. Finally, the curved heads of the tank are welded to the shaft, and a complete single-layer steel tank is formed. The large rolling machine appears to be exempt from permitting requirements via Rule 285(2)(l)(i), and the welding equipment appears to be exempt from permitting requirements via R 285(2)(i).

The paint booth is a large room with three vents (one has a stack and other two have outside vents covered with filters. The booth filters appeared to be in place and in good shape. The room only has one coating gun. The coating process is conducted in different parts of the room based on the size of the tank. For two exhausts, the filtered exhaust goes through a water bath and then to the ambient air through cloth filters. These outside filters were torn, so I requested them to replace the torn filters and sent a picture to me (see attached). On December 19, 2019, Chad told me that the filters had been replaced. I also recommended during inspection that for better exhaust gas dispersion and avoid any odor complaint, they may want to install stacks for these two vents.

On January 31, 2020, Kevin Wozniak, EHS Manager, emailed the 2019 monthly coating usage and the usage ranged from 177 to 199 gallons per month. They expressed interest in applying for a permit to install for this booth. Forwarded PTI application form and general information related to applying for the PTI. The submitted records show that the monthly usage is below 200 gallons per month, so the booth is considered exempt from permit to install requirements pursuant to R287(2)(c). The monthly usage is very close to 200 gallons per month, so the facility is advised to obtain to permit to install for this booth.

After tank construction, grit blasting smooths the tank. The grit blaster was not operating during the inspection. Emissions from grit blasting are controlled by fabric filters, replaced as needed, from which grit is reclaimed. Filters were in place and appeared to be operating properly. The grit blasting appears to be exempt from permitting requirements via R 285(2)(l)(vi)(B).

Compliance Determination

Based on the inspection, it appears that Highland Tank is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to the inspection, PTI No. 546-96 was voided on December 3, 2019.

NAME Sebastian Kallimka

DATE 2/3/2020

SUPERVISOR Joyce B.