

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

N309023373

FACILITY: Lapeer Industries Inc., Plant 2		SRN / ID: N3090
LOCATION: 290 MCCORMICK DR, LAPEER		DISTRICT: Lansing
CITY: LAPEER		COUNTY: LAPEER
CONTACT: Barry Shelton, Director of Health & Safety/Facilities		ACTIVITY DATE: 10/03/2013
STAFF: Brian Culham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Investigate area odor complaints. Make initial contact. Determine compliance.		
RESOLVED COMPLAINTS:		

Barry Shelton - Dir. Health and Safety – barry.shelton@lapeerind.com

This was an unannounced scheduled inspection. It also served to further investigate the many odor complaints received over the past year related to industrial operations in the McCormick, DeMille, and Saginaw area of the City of Lapeer. This was also an initial contact for me.

Plant 2 of Lapeer Industries is located on the southeast side of Lapeer. The northeast corner of the plant property is next to the northwest side of Elite Cleanroom Services. Complaints have alleged solvent odors from Elite. The odors have been identified as paint like. The paint shop at Plant 2 is located in the northeast corner of the plant.

Because this facility occasionally fulfills sensitive government security contracts a nondisclosure form is required to be signed prior to plant entry.

Plant 2 of Lapeer Industries is a metal fabrication shop with a surface coating line. The plant maintains approximately 30 CNC machines and other metal fabrication tools. The products being machined are large structural components.

There are multiple locations of Lapeer Industries in Lapeer but none are contiguous to Plant 2. The criteria pollutants, Fine Particulate Matter (PM₁₀) and Volatile Organic Compounds (VOC), are emitted in the greatest quantities, but neither is expected to exceed 10 tons annually. Therefore, Lapeer Industries is considered a True Minor Source of all criteria pollutants. Lapeer Industries is also considered an Area Source of Hazardous Air Pollutants (HAPS) as well. The plant is likely not subject to MACT Subpart XXXXXX because they are primarily engaged in an activity that is not one of the nine identified categories. The plant is subject to MACT subpart HHHHHH if they use coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Plant 2 of Lapeer Industries does not presently report to the Michigan Air Emissions Reporting System (MAERS), nor are they required to.

No.	Emission Unit or Flexible Group	Description	Permit Number or Exemption	Comp. Status
1	EUCNC	Approx. 30 CNC machines	Rule 285(l)	C
2	EUPaintLine	2 paint booths and a cure oven	Rule 287(c)	C

Prior to entry I drove around the plant. Paint like odor was experienced just north of the plant (see attached odor survey). I did not identify any opacity from any part of the plant. I arrived at Lapeer Industries Plant 2 at 8:45 am. I asked for Joe Gallant the Plant Manager. I was informed that he was no longer with the company. His position is currently unfilled. I met with Barry Shelton.

I gave B. Shelton the Rights and Responsibilities Brochure. I explained that I needed to inspect this facility and Plant 4 and that odor complaints have been received for both locations. I stated that I needed to focus on the paint lines.

B. Shelton escorted me through the plant.

10/11/2013



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1. EUCNC

We walked past a series of CNC and other drilling, grinding, and turning machines. The parts were large welded structures of dimensional steel. B. Shelton estimated that they were operating about 30 machines. The machines I saw were all internally vented. I did not identify any machines that would not satisfy the Rule 285(l) (vi) conditional exemption from the need to obtain a Rule 201 air use permit.

2. EUPaintLine

There are two paint booths and a curing oven installed in the northeast corner of the plant. Both booths had adequate mat type overspray filters installed. An overhead monorail delivers the parts to the two booths and oven. There was not any painting occurring while I was inspecting the paint area. There was no paint odor.

David Zwiez is the Paint Department Manager for Lapeer Industries. The plant operates two shifts 5 days a week. I asked if they had been painting at 7:00 pm on Monday earlier this week. D. Zwiez stated that he had painters in the shop on that shift. It was likely that they were painting.

I asked D. Zwiez what he would estimate the daily coating use to be. He estimated 5 to 10 gallons per day. He stated that production had slowed down over the last year. Painting does not occur all day every day.

D. Zwiez stated that the majority of the painting being done was a primer coat. He continued saying that an epoxy primer and a zinc primer are both used. He gave me MSDS for both products. Neither product contains water nor Cr, Pb, Mn, or Cd.

Before I left, coating use records were submitted to me. The records are based on purchasing and not on actual paint use. The records were for both plants. I stated that to satisfy the Rule 287 exemption from the Rule 201 requirement to obtain an air use permit, a monthly use record must be maintained. Although a monthly record is required most companies maintain the records on a daily use basis. D. Zwiez stated that they had been keeping these types of records, but discontinued doing so about a year ago because nobody could remember why they were necessary. He stated that he will start doing so again.

The records indicated that about 300 gallons of paint are being used annually in the two booths at this plant. The Epoxy Zinc Primer makes up 55 gallons of the 300 gallons or about 18%. An anti-fire coating makes up another 28%.

I left the facility at approximately 10:00 am to inspect Plant 4 and returned at approximately 11:00 am. After leaving the plant, I again drove the area to evaluate odors (see attached).

NAME Brian Sullivan DATE 10-11-2013 SUPERVISOR M. Miller