

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

N310941277

FACILITY: NWH Roof & Floor Truss Systems		SRN / ID: N3109
LOCATION: 16775 Industrial Parkway, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: CLINTON
CONTACT: Edward Joseph , Owner/Operator		ACTIVITY DATE: 08/15/2017
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection for PTI 822-91		
RESOLVED COMPLAINTS:		

On August 15, 2017, I conducted a self-initiated inspection of NWH Roof & Floor Truss Systems (NWH) in Lansing. This facility has never been inspected.

Facility Address:

16775 Industrial Parkway, Lansing, Michigan 48906

Facility Contacts:

Mr. Edward Joseph, Owner/Manager, 517-323-1996, ed@nwhrooftrussystems.com

Ms. Jeri Ashcraft, Office, 517-323-1996, jeri@nwhrooftrussystems.com

Ms. Donna Gorman, Front Desk, 517-323-1996, frontdesk@integratedstealth.com

Facility Description:

NWH builds and refurbishes machines to manufacture building trusses for roofs and floors. The facility has metal surface grinding equipment, welding, fabrication, and a large paint area. NWH is located in northwest Lansing in an industrial/commercial area west of the Royal Scott Golf Course. The area surrounding the plant is mixed use with some residential housing to the south, and commercial/industrial properties to the north, east and west.

List of Active Air Use Permits:

PTI 822-91 is for an airless painting process issued to a former building tenant, Commercial Machinery Fabricators, Inc. The process was originally installed in August of 1991 and dry filters were to be installed over the general exhaust points.

Regulatory Review:

The facility is a minor source of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program.

Michigan Air Emissions Reporting System (MAERS):

The facility is not required to report emission information to MAERS.

Inspection:

Arrived: 11:24 AM

Departed: 12:40 PM

Weather: 73°F, N 5 MPH, UV 5 Moderate

No visible emissions (VEs) were observed from any of the facility exhaust stacks upon arrival. No odors were identified surrounding the facility.

I met with Edward Joseph (Owner/Manager), and Jeri and Donna also participated. The purpose of my visit and the status of the facility operations were discussed. He was not aware that there was a PTI and had never been inspected by AQD. The facility consists of three buildings. The building heat in the manufacturing area is radiant and there are no emergency generators. A facility tour was taken followed by a records review. The facility includes the following:

- A painting area (PTI 822-91)
- Assembly areas
- Welding
- Surface grinding and machining

- Parts and scrap storage
- Administrative offices

There is hand-held grinding and machining done in the open area. Emissions are to the in-plant environment and exempt from permitting per Rule 285(2)(l)(vi)(B). Manual welding is also done in the area and is exempt from permitting per Rule 285(2)(i).

PTI 822-91 -

The painting process is in an open area across from several fabrication areas. Hand-held spray applicators are used. The paint system is solvent-based and a solvent naphtha is used for cleanup. Sidewall exhaust fans pull air across the area on the south side of the building. There were no dry filters installed over the exhaust points as required by Special Condition (SC) 18. Outside the building there was no evidence of particulate emissions due to painting operations and no visible emissions were seen while painting. There was some odor outside the paint area along the south wall from painting.

A solvent-based parts washer/cleaner is located in the shop area. The lid on the machine was open and I recommended they keep the lid closed when not in use. This process is exempt per Rule 281(2)(h).

Records Review:

Safety Data Sheets (SDS) are maintained in a large three ring binder. Purchase records for paint and solvent usage were provided dating 11/27/2016 to 8/4/2017.

SDS for the paint coatings and thinners, and cleanup solvents showed various volatile organic compounds (VOC) and some HAPs. Monthly records of coating usage and VOC emission calculations are not being kept in a way that demonstrates compliance with the air permit, but the permit doesn't have clear recordkeeping requirements that include calculation of VOC emissions.

For the painting process which is operating under PTI 822-91, according to the information provided, 383 gallons of paint and 132 gallons of solvent and thinner has been purchased/used in the last 8 months.

VOC emissions were estimated using the worse-case VOC contents for the paints and solvents as follows:

Paint VOCs = 383 gallons x 4.66 VOC lb/gallon = 1,784.7 lbs

Solvent VOCs = 132 gallons x 7.4 VOC lb/gallon = 976.8 lbs

Total VOCs = 2,761.5 lbs x ton/2000 lbs = 1.4 tons

If the rate of production through the year is the same as the last 8 months then tons per year (tpy) of VOC emissions is estimated as follows:

VOC emissions = 1.4 tons x 12 months/8 months = 2.1 tpy < 2.2 tpy limit on PTI 822-91

It is estimated that VOC emissions are in compliance with the permit limits. The facility is developing a recordkeeping system to track compliance with the permit limits.

Copies of the records are attached to this activity report.

Summary:

The facility appeared to be in compliance with all applicable air quality rules and regulations, and PTI 822-91. They are working on developing recordkeeping for VOC emissions and also will confirm when the filters are installed in the exhaust points for the painting process area.



Image 1(6) : Product Finishing

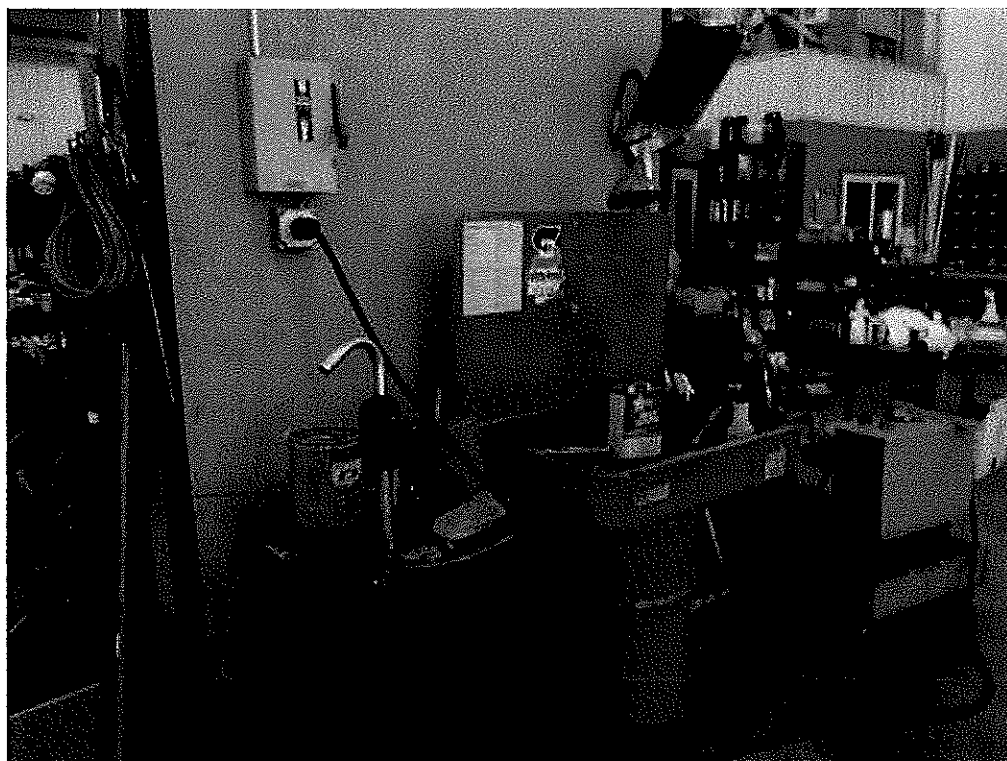


Image 2(7) : Open parts cleaner - to be cleaned out and lid closed.



Image 3(1) : Fabrication area

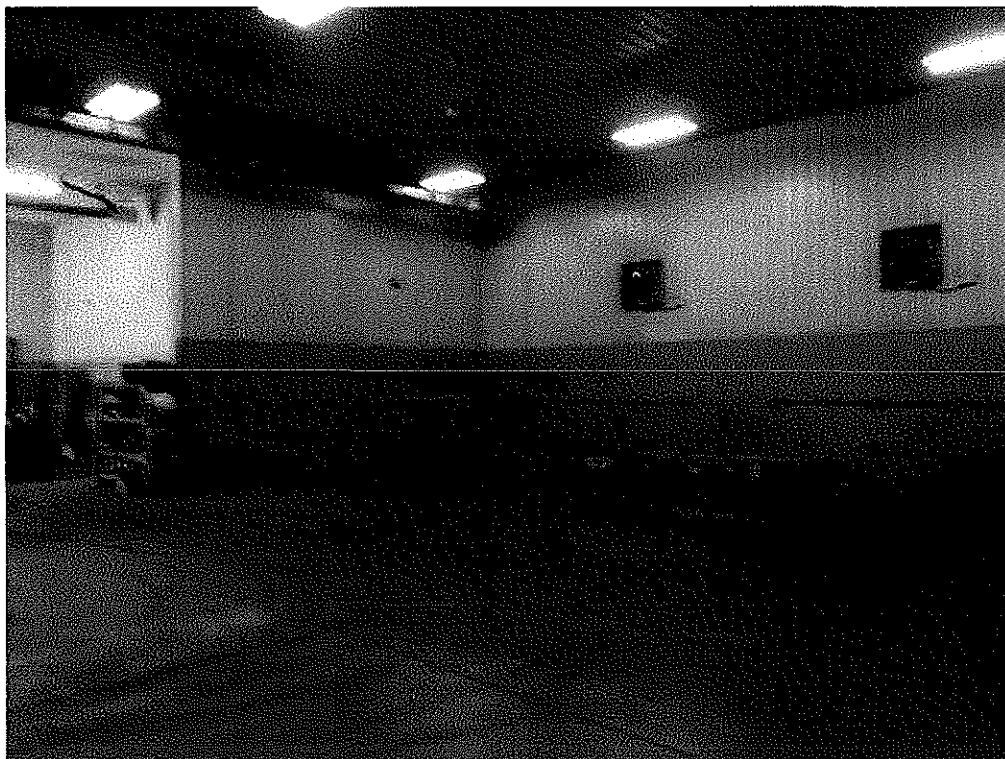


Image 4(2) : Painting area



Image 5(3) : Fabrication area



Image 6(4) : Exhaust vents from painting area



Image 7(5) : Heater

NAME Julie L. Brown

DATE 8/29/17

SUPERVISOR D.M.