

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

N558862811

FACILITY: Superior Fabrication LLC		SRN / ID: N5588
LOCATION: BLDG 434 DOLAN ST, KINCHELOE		DISTRICT: Marquette
CITY: KINCHELOE		COUNTY: CHIPPEWA
CONTACT: Ferne Sherlund , Human Resource Manager		ACTIVITY DATE: 05/03/2022
STAFF: Lauren Luce	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted Inspection FY22		
RESOLVED COMPLAINTS:		

Facility: Superior Fabrication (SRN: N5588)

Location: 17499 Dolan Street, Kincheloe, Chippewa County, MI, 49788

Contact(s): Ferne Sherlund, Human Resource Manager; Bill Johnson, Maintenance Supervisor

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Superior Fabrication Company, LLC is a steel fabricator that provides products for original equipment manufacturers, aftermarket, and end-users. The facility fabricates various equipment such as forklift masts, hydraulic fracturing pumps, and armor for defense applications. The facility is located in an industrial area on the former Kincheloe Air Force Base.

Process Description

Superior Fabrication is a heavy metal manufacturer. The metal components are produced from steel bar, sheets, and beams. They are subject to machining, cleaning, blasting, pressing, bending, and finishing operations.

Emissions Reporting

Superior Fabrication is not required to report its annual emissions to Michigan Air Emissions Reporting System (MAERS).

Regulatory Analysis

The facility is subject to PTI No. 888-93 for spray painting operations using a Devilbiss booth and Binks model spray guns. The facility may also be subject to 40 CFR 63 Rule HHHHHH depending on HAP compounds contained within the coatings used.

Compliance History

The facility has not received any violation notices in the past five years. The facility was last inspected in November 2014 and was found to be in compliance with all applicable air quality rules and federal regulations at that time.

Inspection

On March 29, 2022, AQD Staff (Lauren Luce) conducted an unannounced inspection of Superior Fabrication. AQD staff arrived at the office building and met with Human Resource Manager, Ferne Sherlund and Maintenance Supervisor, Bill Johnson. It was explained to Ferne and Bill that the purpose of the inspection was to ensure compliance with PTI No. 888-93 and all other applicable air pollution control rules and federal regulations.

The inspection began by reviewing and discussing records. Ferne and Bill provided an overview and location of the equipment on site. A tour of the facility was then provided, starting with building 434. Building 434 houses the main office, shot blaster, and plasma cutting table. The shot blaster and plasma cutting table are equipped with baghouses and have emissions that are released only into the general in-plant environment. They are both considered exempt per R 336.1285(2)(l)(vi)(c)). PTI No. 888-93 is for a paint spray booth which was located in building 434. This spray booth has been removed from the site and the area is currently used for storage.

The tour continued to building 425. This building is located one road over from building 434 and is connected to building 427. Two Global Finishing Solutions (GFS) Model #CDG-1612-PDT-44-B-B-CUR-S paint spray booths were installed in building 425 in 2013 or 2014, according to the company. The booths are equipped with dry filters and are exhausted through two vertical stacks to the atmosphere. No permit was obtained for these booths, prior to installation, and the facility does not have records to meet a permit exemption. There is also a wash booth which utilizes a phosphorus wash. Building 427 has a sand blaster. The sand blaster is equipped with a baghouse and has emissions that are released only into the general in-plant environment. This emission unit is considered exempt per

R 336.1285(2)(l)(vi)(c)).

Following the tour, we returned to the main office to discuss records for the paint spray booths. Ferne noted they had not been keeping paint usage records and requested some time to gather invoice information to determine usage. Ferne emailed three months of estimated paint usage records on 03/31/2022. A follow-up email was sent requesting two years of paint usage records. Ferne stated that she would continue to work on this request.

On May 3, 2022, a follow-up inspection was conducted with Michael Conklin (AQD). AQD staff met in the main office with Bill Johnson, Maintenance Supervisor. It was explained to Bill that the purpose of the follow-up inspection was to ensure compliance with applicable air pollution control rules and federal regulations.

The inspection began by discussing facility operations and the paint spray booths with Bill and painting staff. Staff estimated they use approximately four gallons of paint and four gallons of primer daily. The facility operates five days a week. Filters in the paint spray booths are usually changed weekly. The paint used is solvent based and primarily supplied by Sherwin Williams. A tour of the facility was then provided. The inspection concluded by discussing next steps with Bill.

It was explained that the facility would be receiving a Rule 201 violation notice for not obtaining a PTI prior to installation of the paint spray booths and not having records to demonstrate compliance with a PTI exemption.

Compliance

Based on the inspections performed, Superior Fabrication appears to not be in compliance with all applicable Air Pollution Control Rules. PTI No. 888-93 should be voided as the equipment covered under this permit has been removed and is no longer in use.

*****Update
05/06/2022

AQD Staff has reviewed the response to the Rule 201 violation notice that Superior Fabrication received on 5/6/22. Additional information is required to meet a Rule 287c exemption. A record-keeping form will need to be filled out for the most recent two-year period. This information is to be submitted before 6/27/22. If unable to provide this information or if coatings use exceed 200 gallons per month in any month (as applied minus water), a Permit to Install will need to be obtained.

*****Update
06/28/2022

AQD Staff has reviewed the response to the additional information request. The record-keeping form was provided with two years of records. A monthly summary sheet of coating usage was also provided. Coating use does not exceed 200 gallons in any month. The facility will continue to keep coating usage records. The provided records appear to show compliance with a Rule 287c exemption.



Image (1): PAINT SPRAY BOOTH.



Image (2): PAINT SPRAY BOOTH INTAKE AND STACKS.

NAME *Sam Sam*

DATE 6/30/2022

SUPERVISOR *Michael Melin*