

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

U70181036047077

FACILITY: Shape Corporation		SRN / ID: U701810360
LOCATION: 14600 172nd Ave, Grand Haven		DISTRICT: Grand Rapids
CITY: Grand Haven		COUNTY: OTTAWA
CONTACT: Michael Westbrook , Safety & Environmental Manager		ACTIVITY DATE: 10/26/2018
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2019 unannounced.		
RESOLVED COMPLAINTS:		

Clean Air Act Inspection report for Shape Corporation, (Shape) Grand Haven, Michigan

Regulatory authority

Under the Authority of Section 5526 of Part 55 of NREPA, The Department of Environmental Quality 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 Background

Shape Corporation is a manufacturer of automotive parts. The facility specializes in the manufacturing of bumpers and energy management systems (brackets). The main processes at this facility include roll forming, welding laser cutting and laser welding of high strength steel bumpers, roof rails and other automotive components.

Shape Corporation's facility is a minor source of air contaminants and is not subject to the Title V program.

Compliance History

The facility has not received any violation notices in the past five years.

Location

Shape Corporation has a facility located at 14600 172nd Ave, Grand Haven, Michigan. This area is a light industrial area with residential properties to the north and east. The nearest residential structure is approximately 900 feet to the north of the facility. The 172 Ave facility is also located in close proximity to Shape Corp's Comstock Street and Hayes Street facilities. The facilities were inspected on the same day as the Hayes Street campus. The inspections are recorded in separate inspection reports. The EPA is currently reviewing the policy on single source determinations and Shape Corporation should reevaluate if the associated buildings are a single source, or if they are separate prior to installation of new emission units.

Introduction and purpose of inspection

On October 26, 2018 Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced, self initiated inspection of

Shape Corporation. The MDEQ inspected the facility campus located at 14600 172 Ave, Grand Haven, Michigan.

The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules.

Observations and facility processes

AQD staff met with Michael Westbrook, Safety and Environmental Manager, presented their identification and informed the representative of the intent of the inspection. The facility representative agreed to show the AQD the facility and its processes. The facility's processes are described in some detail below.

The facility's main process is roll forming, welding, laser cutting, laser welding high strength steel bumpers, roof rails and other automotive components. The facility is approximately 360,000 square feet and houses multiple welding stations. The stations consist of multiple booths that share a common exhaust. Some of the equipment exhausted outside through baghouses.

Regulatory analysis and compliance evaluation

Exempt processes

Shape Corporation's primary activities of metal processing, rolling cutting and bending appear to be exempt from requiring a permit. These processes, though they emit air contaminants are not subject to Rule 201 which would require a permit so long as they meet the requirements of R 336.1285(1)(2)(l)(i) and R 336.1285(2)(i). Rule 285 in part states ... Rule 285. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met. (2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following: ... (l) The following equipment and any exhaust system or collector exclusively serving the equipment: (i) Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals. ... (i) Brazing, soldering, welding, or plasma coating equipment.

Discussion

Compliance statement: It appears that Shape Corporation is in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules.

NAME _____

DATE 12/26/18

SUPERVISOR _____