

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

*FY 2015 Insp*

U74141627728838

FACILITY: Carson Fabrication Company	SRN / ID: U741416277
LOCATION: 1701 Sinclair Street, St. Clair	DISTRICT: Southeast Michigan
CITY: St. Clair	COUNTY: SAINT CLAIR
CONTACT:	ACTIVITY DATE: 03/10/2015
STAFF: Iranna Konanahall	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 complaint investigation and level-2 self-initiated inspection Carson Fabrication, LLC	
RESOLVED COMPLAINTS:	

*U-74-14-16277-SAR-2015 03 10*

**Carson Fabrication, LLC (U74-14-1627)**  
**1701 Sinclair Street, St. Clair, MI 48079-5512**

### FY 2015 Complaint

1. **C-15-00260 (Received: 12/22/2014; Incident: 12/22/2014; Complainant: Confidential; Cleaning air filters on ground that goes into sewer.**

On March 10, 2015, I conducted a complaint investigation and level-2 self-initiated inspection Carson Fabrication, LLC ("the company" or "Carson"), a steel fabricating facility, located at 1701 Sinclair Street, St. Clair, MI 48079-5512. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

On December 22, 2014, Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) received a complaint from Mr. Anonymous, regarding powder coating bags cleaned outside resulting in powder paint particles fall out.

During the inspection / investigation, Mr. Gary Corrigan (Phone: 810-326-0532; Cell: 810-434-1396; Fax: 810-326-0551; E-mail: gary@carsonfab.com), Owner, assisted me.

Carson Fabrication is in the business of steel fabricating steel equipment such as safety guards, platforms, stairs, etc. The manufacturing involves cutting, grinding, welding, coating (both liquid and powder paints). Painting is accomplished using one powder coating booth and one liquid coating booth.

### Rule 287(c) Paint Spray Booth

One paint spray booth (15 ft. W x 20 ft. D \* 12 ft. H) with a back-draft dry filter system (7 on one side and 8 on other side filter panels) is present. Both water-based and solvent-based (approximately, 40 gallons / month water-based and 40 gallons / month solvent-based) paints are used. Paint usage records are not kept.

I asked Mr. Corrigan to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. I also asked him to keep records of paint and solvent usage according to Rule 336.287(c).

HVLP guns are used. All liquid coatings are air-dried (< 194 °F) either at the booth or powder

coating oven.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c).

Upon keeping usage records, the coating booth meets all of the Rule 336.1287(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

### Rule 287(d) powder coating booth

One paint spray booth (12 ft. W x 25 ft. D \* 12 ft. H) with a back-draft dry filter system is present. The filter system consists of three layers: one tack filter, one bag filter system consisting of 4 bags and 4 HEPA filters.

Powder coating is sprayed using manual spray gun. Over-spray particles collected by the filter system are not reused as paint; instead disposed of. The bags are cleaned in liquid paint spray booth. However, powder from the powder coating booth are swept up and reused.

The company has good overspray powder capture and control system. Immediate neighbor is a new car dealership which has never complained.

Powder coating booth makes use of one natural gas fired oven for baking. Liquid coatings are air-dried in this booth as well.

Generally, the filters capture the powder and the powder is reused / recycled of coating the parts. However, Carson does not recycle captured particles due high cost of such equipment (about \$10,000). Only booth spills are scooped up for reuse.

### Miscellaneous machines

Cutting, grinding, welding, hand-held torch cutting, etc. machines / equipment are present. The machines do not exhaust to outside ambient air.

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 (I).

The complaint is from an ex-employee. According to the company officials, there several laid off or fired employees who complain to governmental agencies such as MDEQ, MIOSHA, etc.

### Conclusion:

The complaint is resolved. The processes are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287 and 336.1285.

NAME J. Penanahell DATE 03/17/2015 SUPERVISOR CJE