

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

U0313288924287

FACILITY: L & W Engineering		SRN / ID: U03132889
LOCATION: 808 E 32nd Street, Holland		DISTRICT: Kalamazoo
CITY: Holland		COUNTY: ALLEGAN
CONTACT: Stephanie Bottorff, Environmental Management Representative		ACTIVITY DATE: 02/12/2014
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT:		
RESOLVED COMPLAINTS:		

An inspection was conducted at this metal stamping and welding operation. The facility manufactures steel parts primarily for the automotive industry.

This was an initial inspection of this company to determine compliance with the Michigan Air Pollution Control Rules. Stephanie Bottorff is an Industrial Engineer that is the environmental representative for the company.

The facility has three areas within the building.

Tool Room

This area supports the rest of the plant as a tool, die, and maintenance shop.

There is one Safety-Kleen parts cleaner in the shop. This size of cold cleaner is Rule 201 exempt (need to obtain a permit) due to Rule 281(h). This is a sink over drum style design. They use a petroleum distillate (mineral spirits) with a 148 deg F flash point. This cleaner is in compliance with Rule 707. The lid is being kept closed, the written operating procedures are posted, and the solvent is quickly drained down into the drum after use.

Small amounts of misc. cleaners are used. The emissions are well below the Rule 290 permit exemption threshold.

Press Room

There is no equipment subject to air pollution regulations in this area.

Welding Room

There are three separate ductwork systems within this area to collect and exhaust the welding fumes. All of the emissions are exhausted without any filters or other controls. The NW system has 2 MIG welders, the NE system has 2 MIG welders, and the Central system has 6 MIG welders. These layouts are flexible and may change over time. There are also some resistance welding operations and some other portable equipment in the area.

All of the welding is Rule 201 exempt due to Rule 285(i).

Staff advised the company that they may be subject to the federal MACT standard Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. The responsibility for this subpart has not been delegated to Michigan AQD.

After leaving the facility, the roof area of the building where the welding exhaust is located was observed. There were no visible emissions viewed.

NAME Dale Turton

DATE 2/13/2014

SUPERVISOR MA 2/13/2013