

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

B762563403

<b>FACILITY:</b> LAFATA ENTERPRISES INC.		<b>SRN / ID:</b> B7625
<b>LOCATION:</b> 50905 HAYES RD., SHELBY TWP		<b>DISTRICT:</b> Warren
<b>CITY:</b> SHELBY TWP		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> James Jensen , Plant Manager		<b>ACTIVITY DATE:</b> 06/28/2022
<b>STAFF:</b> Sebastian Kallumkal	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Facility visit as part of ROP Renewal Application Technical Review.		
<b>RESOLVED COMPLAINTS:</b>		

On Tuesday, June 28, 2022, I, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff Sebastian Kallumkal conducted an announced, self-initiated inspection at LaFata Enterprises, Inc. (“LaFata”) located at 50905 Hayes Rd, Shelby Charter Township, MI 48315. The purpose of this inspection was to familiarize with the facility’s processes as part of the Renewable Operating Permit (ROP) Renewal application technical review. Facility’s renewal application was due by May 8<sup>th</sup>, 2022. The application was submitted on May 17, 2022. The application was submitted late, so the facility lost the application shield. A Violation Notice (VN) was sent to the facility on May 31, 2022. The application was evaluated to be administratively complete.

I arrived at the facility at around 11:00 AM. I met Mr. James Jensen, Plant Manager. I introduced myself and stated the purpose of the meeting. I provided my credentials. Initially, we discussed the processes at the facility and the history of the facility.

Based on our discussions either AUTOLINE (installed in 1978 according to the ROP) or BOOHT3 was the original coating booth. He was not sure when either was installed. In 2001, BOOTH3 was converted to a water-based coating booth.

Based on the review of the PTI application for 1077-80 and 295-04, BOOTH3 appears to be the original booth (PTI NO. 1077-80 was issued for a dry filter booth). PTI No. 295-04 included Autoline. This Autoline was replaced in 2015 with Autoline 2. Autoline does not seem to be a dry filter booth.

*40 CFR 63, Subpart JJ standards were first proposed in the Federal Register on December 6, 1994. (59 FR 62652). According to 40 CFR Part 63, Subpart A, New source means any affected source the construction or reconstruction of which is commenced after the Administrator first proposes a relevant emission standard under this part (40 CFR Part 63) establishing an emission standard applicable to such source.*

*EU-AUTOLINE2, EU-BOOTH1, EU-BOOTH2, EUBOOTH3 were installed/modified after December 6, 1994. Therefore, this facility is considered “New Source” for 40 CFR 63, Subpart JJ applicability.*

I informed him that the facility is subject to the emission standards for new sources in 40 CFR 63, Subpart JJ because all the current coating booths appear to be installed/modified after the proposed date for this NESHAP. Based on the previous reports, the facility appears to be in compliance with the new source emission standards also.

We also discussed the potential to emit (PTE) calculations for the VOC and HAP emissions. He did not submit PTE for other criteria pollutants (NOx, CO, SO2, Pb, PM, etc.) because they only have three very small combustion sources.

He explained that he calculated PTE for HAPs based on the actual HAP emissions from 2021 and extrapolated that to the facility's PTE for VOC = 89.3 TPY (amount of HAP emitted if coatings including other solvents are used that would emit 89.3 TPY VOC). He told me that their coating contents are not changed.

Based on the VOC emission limits in the current PTIs and VOC emissions from the 3 small natural gas fired combustion sources, facility appears to be a true minor source for VOC. Based on the calculations, the facility appears to be an area source for HAPs. However the facility wants to keep the ROP.

He informed me that the facility does not have a continuous coater, as defined in the NESHAP JJ. The parts in Autoline 2 are not moved in conveyors. The sprayers spray coatings when parts are recognized. Also, the facility does not use contact adhesive.

EU-AUTOLINE2, EU-BOOTH1, and EUBOOTH2 use solvent-based coatings while EU-BOOTH3 uses water-based coatings.

Small amount of glue is used. They also started using glazers for some parts. Uses about 35 gallons per year and has about 7 glazing stations. The process is similar to staining. I informed him to include this usage in the emissions calculations.

Booth1 – does stain and topcoat; Booth2-does stain only. Wiping stains are done on the table.

Booth 3 – is located in the south building.

The woodworking processes in the North building uses 3 baghouses and all are vented into the plant. The main baghouse is located outside of the building and has a cyclone to remove the large parts followed by a baghouse to remove the fine dust. Two other small baghouses (series of bags) are located inside the building.

The woodworking processes in the South building use 2 baghouses and all are vented into the plant. The main baghouse is located outside of the building and has a cyclone to remove the large parts followed by a baghouse to remove the fine dust. Another small baghouse (series of bags) is located inside the building. The collected wood dust materials are hauled offsite.

The smaller baghouses were installed during the installation of AUTOLINE2 (in 2015).

He also told me that they have a natural gas fired boiler (750,000 BTU/hr) to heat and dry the parts in the Autoline 2. They use two 1 MMBTU/hr each, natural gas fired space heaters to heat the make up air and the building during cold seasons.

The baghouses are inspected semi-annually for any tear and leaks and the connections are lubricated monthly. Any malfunction in the baghouses is immediately noticed due to the presence of dust in the exhaust.

After the meeting and discussion, he accompanied me for a tour of the facility. We visited Autoline 2, Booth 1, Booth 2, staining stations, and glazing stations and wood working processes, two small baghouses, and the large baghouse in the north

**building. We also visited Booth 3, wood working processes, the small baghouse and the large baghouse located in the south building.**

NAME Sebastianykallemkal

DATE 7/11/2022

SUPERVISOR Joyce