

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

N152940156

FACILITY: Shields Manufacturing		SRN / ID: N1529
LOCATION: 1320 S. Graham Road, SAGINAW		DISTRICT: Saginaw Bay
CITY: SAGINAW		COUNTY: SAGINAW
CONTACT: Scott Luebbert, Plant Manager		ACTIVITY DATE: 06/07/2017
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled inspection of PTI #234-88, #233-88, #236-88, #237-88 and #238-88.		
RESOLVED COMPLAINTS:		

I (glm) performed an unannounced, scheduled inspection at Shields Manufacturing on June 7, 2017. I met with Mr. Scott Luebbert, Plant Manager. MACES has the facility listed as Shields Manufacturing, however the facility is Cignys, Shields Manufacturing. The purpose of the inspection was to determine compliance with the following (5) active PTIs: #233-88, #234-88, #236-88, #237-88, and #238-88. At the time of the inspection the facility was in compliance with all applicable permits and known air quality regulations.

Cignys, Shields Manufacturing fabricates and constructs various parts and equipment to numerous industries - including defense, aerospace and automotive. Due to the clients Shields Manufacturing serves, it is regulated as an ITAR (International Traffic In Arms) facility. ITAR controls the export and import of defense-related articles and services on the United States Munitions List (USML). ITAR regulations are promulgated under Homeland Security and implemented by the Department of Defense. Cell phones are prohibited upon enter this facility.

Mr. Luebbert was not aware of the active PTIs the facility held with AQD. A copy of the (5) active permits and discussion surrounding their applicability took place prior to the tour.

Mr. Luebbert and I toured the facility. The process flow for this facility is similar to that of most manufacturing sites. The product is designed, fabricated, welded, painted, finished and then sent to shipping and receiving. Upon entering the plant I immediately noticed how extremely clean and well-kept the facility appeared to be.

PTI # 234-88 was issued for arc welders. The facility no longer has this equipment. Instead they have mig welders, which are exempt from permitting under R 285(i). PTI # 233-88 was issued for a paint sludge distillation process. During the tour we viewed the mixing room where the distillation process once was installed. The mixing room consisted of a couple of drums labeled for disposal and a table with equipment to mix small batches of paint according to the shop order. The distillation equipment is no longer installed on site. PTIs #234-88 and #233-88 were subsequently void post inspection.

PTIs # 236-88, #237-88 and # 238-88 were issued miscellaneous metal parts painting process which occurs in booths 1, 2, and 3. The permits were issued for three separate booths with total material usage and total VOC emission limits.

During the tour, Mr. Luebbert explained that each booth is provided with a shop packet which dictates the color/type of paint to be applied to an identified part number. Each booth is equipped with either stationary racks or track system racks to hang and spray products. Several employees hand sprays various parts with HVLP spray guns.

Mr. Luebbert and I discussed exemption R287(c) as well and the recordkeeping requirements in the PTIs associated with the paint booths. The facility was not actively keeping records in a format acceptable to the AQD at the time of the inspection, however acceptable records were provided within a couple of days following this inspection. The facility has decided to keep the current PTIs active and to allow flexibility in their material usage.

The facility used a total of 1,001 and 1,235 gallons in 2015 and 2016, respectively. The VOC emissions in 2015 were 3 tons per year (TPY) and 3 TPY in 2016. The total material usage, for all three booths, is limited to 2,600 gallons per year and VOCs are limited to 10.0 TPY and 10.4 pounds per hour. See attached.

At the time of the inspection the facility appeared to be in compliance with applicable state and federal air quality regulations.

NAME Glenn R. McCan DATE 6/22/17 SUPERVISOR C. Hare