

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

N529336597

FACILITY: HADEN SCHWEITZER CORP <i>Now: Louca Aerospace mold</i>		SRN / ID: N5293
LOCATION: 1399 PACIFIC, AUBURN HILLS <i>Systems</i>		DISTRICT: Southeast Michigan
CITY: AUBURN HILLS		COUNTY: OAKLAND
CONTACT: Mark Gabbard, Maintenance Manager		ACTIVITY DATE: 08/09/2016
STAFF: Rebecca Loftus	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT:		
RESOLVED COMPLAINTS:		

On August 9, 2016, I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an inspection of Haden Inc., State Registration Number (SRN): N5293, located at 1399 Pacific Drive, in Auburn Hills, Michigan. The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules, and Permit to Install (PTI) No. 636-90A.

Haden Inc. is no longer in business at this location. The current company is Louca Aerospace Mold Systems (Louca).

Contacts

Mark Gabbard, Maintenance Manager, 248-391-1616, mgabbard@loucaaerospace.com
Warren Sims, Quality Assurance Manager, 248-391-1616, wsims@loucaaerospace.com

Company Overview

Louca provides tooling services to both the automotive and aerospace industries. Currently, Louca has three facilities located in Auburn Hills, Michigan. Plant #1 focuses on aerospace tooling and currently has the Systems and Automotive Divisions. Plant #2 machines tools for Plant #1; equipment located at Plant #2 includes Large CNCs, machining centers, mills, lathes, etc. Plant #3 is a new location which will eventually house the Systems and Automotive Divisions.

- Plant #1: 1399 Pacific Drive, Auburn Hills
- Plant #2: 1460 Atlantic Blvd, Auburn Hills
- Plant #3: Giddings and Taylor Roads, Auburn Hills

This inspection report will focus on Plant #1.

Inspection

I arrived on-site at 9:00am and met with Mr. Mark Gabbard and Mr. Warren Sims. Mr. Gabbard and Mr. Sims escorted me through the building and explained the following.

At this location, Louca currently has two bays dedicated to aerospace tooling and two bays dedicated to automotive.

Aerospace Bays

In the aerospace bays, Louca has multiple surface grinders, disc sanders, sawing equipment, approximately 20 portable welders, presses, water jet cutting, plasma cutting, a paint booth and an assembly area. The grinding/cutting equipment, presses and the welders appears to be exempt from obtaining an air PTI pursuant to Rules 285(i), 285(l)(i), and 285(l)(vi)(B).

The plasma cutting equipment is only exhausted to the in-plant environment. Although this process could potentially be exempt it is permitted under PTI No. 636-90A. PTI No, 636-90A has opacity requirements; during my inspection, I did not observe any opacity from the equipment as it was not operating.

The paint booth also could be exempt from obtaining a PTI pursuant to Rule 287(c). I explained that Rule 287(c) states the following:

Rule 287. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(c) A surface coating line if all of the following conditions are met:

(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.

(ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.

(iii) 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.

During my inspection, the painter turned the exhaust fan on to demonstrate it had appropriate air flow and the paint booth had appropriate fabric filters, however monthly paint records were not available. Based on the work orders, he uses anywhere from 5-20 gallons of paint per week. I explained to Mr. Gabbard and Mr. Sims based on 20 gallons/week the paint booth would qualify for the Rule 287(c) exemption, but Louca needs to establish monthly record keeping for the paint booth and have them available on-site for review.

Automotive Bays

The Automotive Bays have several robotic automotive cells. In this area staff also conduct some machining, spot welding, and have a wood shop with associated indoor dust collection system. The spot welding, machining and wood shop appear to be exempt from obtaining a PTI pursuant to Rules 285(i) and 285(l)(vi)(B).

Additional Information

The remainder of Plant #1 is used for shipping and some panel assembly. Louca also has a fire proof/spill proof storage room for used cutting oils and paints.

Plant #1 did not have any emergency generators, however, Mr. Gabbard stated they will be installing a natural gas generator at the new location (Plant #3). I will send Mr. Gabbard a copy of the Federal Regulations for emergency generators when I email him a copy of this report.

Conclusion

Based on my inspection observations and information provided, Louca appears to be in compliance with the Federal Clean Air Act, Michigan's Air Pollution Control Rules, and PTI No. 636-90A.

Note: The facility name has been updated to Louca Aerospace Mold Systems in the AQD database.

NAME

Rebecca J. [Signature]

DATE

9/9/16

SUPERVISOR

Joye [Signature]