

N7067
MawilaDEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Off-site Inspection

N706773685

FACILITY: LOC PAC INC		SRN / ID: N7067
LOCATION: 13505 HAGGERTY RD, PLYMOUTH		DISTRICT: Detroit
CITY: PLYMOUTH		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 09/18/2024
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2024 Inspection		
RESOLVED COMPLAINTS:		

SCHEDULED INVESTIGATION REPORT
(PCE for an FCE source)**Date of Investigation:** September 18, 2024**Date of Report:** September 18, 2024**Source:** Loc Performance Inc. (Loc Pac)**SRN:** N7067**Address:** 13505 Haggerty Road, Plymouth, Michigan 48170**Subject:** Fiscal Year 2024 Inspection (Off-Site)**Author:** Jill Zimmerman and Jeff Korniski, Air Quality Division, Detroit District Office**Facility Background:**

Loc Performance Inc., also known formerly as Loc Pac, conducts surface coating of metal parts for various customers, including the US Department of Defense. Permit to Install (PTI) No. 85-04B authorizes Loc Pac to operate two coating lines, with each coating line consisting of two primer booths, a primer oven, a topcoat booth, and a topcoat oven. The PTI is written with enforceable synthetic minor limits for volatile organic compounds (VOC) and hazardous air pollutants, (HAP), thus allowing Loc Pac to opt-out of the Title V program and any applicable 40 CFR Part 63 major HAP source standards.

Summary of Off-Site Inspection and Compliance Status:

As an existing synthetic minor Title V opt-out source, Loc Pac is scheduled for a full compliance evaluation (FCE) within the 2024 fiscal year; the last FCE was conducted in 2019. Diminished resources owing to temporary staff vacancies resulted in this being assigned as an off-site inspection for this fiscal year. Loc Pac was considered an appropriate candidate for an off-site inspection because, although an opt-out, emissions have historically been well below 50% of the major source thresholds.

PTI No. 85-04B

This permit provides Special Conditions (SC) for each of the two coating lines (EU-Coating Line 1, EU-Coating Line 2), for the two coating lines collectively (FG-COATING LINES), and for all equipment collectively (grandfathered, exempt, and permitted) at the facility.

VOC emissions from each coating line is limited to 30.0 tons per year and a daily volume-weighted average of 3.5 pounds per gallon of coating, minus water, as applied. Paint spray booths are required to utilize exhaust filters and high volume low pressure (or equivalent) applicators. Collective naphthalene emissions from the two coating lines are limited to 876 pounds per year. Facility-wide annual limits are 89.9 tons VOC, less than 9 tons of individual HAPs, and less than 22.5 tons aggregate HAPs.

The AQD received this facility's annual air emissions report for calendar year 2023 on 3/4/2024. No emissions are reported as having been released from the facility within the calendar year as Loc Pac reports that neither EU-Coating Line 1 nor EU-Coating Line 2 operated. Calendar year 2022 emissions were reported at 2.138 tons VOC and with only EU-Coating Line 1 operational. Over the prior 10 years, average annual VOC emissions are reported at 3.7 tons per year, with a high of 5.27 tons in 2012, and EU-Coating Line 2 has not been operational since 2020, at the latest. The facility is in compliance with the general and special conditions in PTI No. 85-04B because it did not operate in calendar year 2023.

Conclusion:

At the time of the investigation Loc Pac appears to be in compliance with applicable federal and State air regulatory requirements. The facility appears to have not been operated in 2023.

NAME



DATE

10/24/24

SUPERVISOR

JK