

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

P095249715

FACILITY: Lee Transportation		SRN / ID: P0952
LOCATION: 631 Cesar E. Chavez, PONTIAC		DISTRICT: Southeast Michigan
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT: Robert L. Friebe,		ACTIVITY DATE: 07/16/2019
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, July 16, 2019, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar, conducted an unannounced targeted inspection of Lee Transportation, Lee Machinery Movers, and Lee Industrial Contracting (the "facility"), located at 563 North Cass Avenue, Pontiac, MI. All six addresses listed below in the report were inspected. The purpose of this inspection was to determine the facility's compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules.

Violation Notice August 30, 2018

Additionally, this inspection was conducted to follow up on a violation notice issued by the AQD on August 30, 2018. The violation notice was issued in response to a complaint received on August 2, 2018 (Complaint #: C-18-02158). The complainant alleged that sandblasting was being performed outdoors without any engineering controls (enclosure) resulting in large clouds of debris that deposited onto soils, air, surface water, and the road. During the investigation of this complaint on August 10, 2018, Mr. Friebe confirmed that the sandblasting had taken place and showed us the location that it was performed.

Mr. Friebe explained that the sandblasting took place because Lee Transportation was contracted to refinish a bridge. The bridge was disassembled and sent to Lee Transportation in pieces. Lee Transportation had sub-contracted a company (Blastec) to do sand blasting on the bridge to remove old paint. This sandblasting was performed outside with no enclosure. The ground at the location was covered in sand. Small bits of white paint were observed around the area.

The facility's response to the violation notice included a plan to conduct all future sandblasting, grinding, or other machining operations in an appropriately designed enclosure or in the general in-plant environment. I did not notice any evidence of outdoor sandblasting/machining during this inspection. This violation notice may be resolved.

Inspection

This facility is part of a group of contiguous properties/warehouses. Three businesses are located here - Lee Machinery Movers, Lee Industrial Contracting, and Lee Transportation. Mr. Friebe stated that they are separate business entities. I informed Mr. Friebe of the AQD definition of stationary source and told him if he would like to separate the facilities for AQD purposes, then he would need to prove that they each meet the AQD definition of a stationary source. I inspected all of the following locations:

Transportation (CN) Building –	563 N. Cass Ave, Pontiac, MI 48342
South Fabrication / Paint Building –	585 Cesar E Chavez, Pontiac, MI 48342
Mechanics / Paint Building –	701 Cesar E Chavez, Pontiac, MI 48340
HR / Carpentry / HVAC Building –	605 Cesar E Chavez, Pontiac, MI 48342
Main Building (Office, Electrical, Pipefitting, Foundations, Manlift) –	631 Cesar E Chavez, Pontiac, MI 48342
Lee Machine Movers (LMM) North building –	675 Cesar E Chavez, Pontiac, MI 48340

I arrived at the facility at around 9 am and met with Mr. Robert L. Friebe, Facility Manager. I identified myself and stated the purpose of the inspection. Mr. Friebe gave me a tour of the facility.

The Lee complex serves as a one stop shop for industrial contracting services. Lee Contracting moved to this location in 1995 with 10 employees. The business has expanded greatly since that time. There are three separate businesses on this site:

Lee industrial Contracting provides diverse turnkey solutions to heavy industry. Services include building

foundations, rigging, electrical, fabrication, maintenance, and others.

Lee Transportation (founded in 2013) provides transportation services to a variety of industries on a contract basis. Services include transloading, specialty hauling, general freight, and rail.

Lee Machinery Movers provides equipment moving services to industries on a contract basis. Services include millwright services, rigging, heavy hauling, and crane services.

We made our way around each of the buildings. There are two paint booths present. One booth is located in the "South Fabrication / Paint Building". This booth is used to paint larger pieces of equipment. No painting was taking place at the time of inspection. A booth exhaust stack was present that is preceded with an appropriately installed fabric filtration system. Paint usage records are maintained. Based on the records I reviewed on-site, approximately 40-50 gallons of paint was used since June 1, 2019 (1.5 months). Much of the paint used is waterborne. Mr. Friebe provided me with paint usage records dating back to my previous inspection on August 10, 2018. Paint usage in this time period is always reported below 200 gallons per month. This booth appears to be exempt from Rule 201 requirements pursuant to Rule 287 (2)(c).

The other booth is in the "Mechanics / Paint Building". This booth is used to paint vehicles and is sized accordingly. There was active spraying going on during my inspection, so I was unable to verify that the filter was in place. I observed that a fabric filter was installed during my last inspection. Paint usage records are maintained. Based on the records I reviewed, approximately 5-10 gallons of paint was used since June 1, 2019 (1.5 months). Mr. Friebe provided me with paint usage records dating back to my previous inspection on August 10, 2018. Paint usage in this time period is always reported below 200 gallons per month. This booth appears to be exempt from Rule 201 requirements pursuant to Rule 287 (2)(c).

There are various storage tanks and a diesel refueling station (used to fuel on-site equipment) which appear to be exempt from Rule 201 requirements pursuant to Rule 284 (2)(c) and (g).

Mr. Friebe stated that there are no boilers. All facilities are heated with natural gas fired space heaters that appear to be exempt from Rule 201 requirements pursuant to Rule 282(2)(b)(i).

There is a 17 KW natural gas fired emergency generator on-site. Mr. Friebe provided me with documentation showing that this generator is EPA certified for conformity with the Clean Air Act and 40 CFR Part 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. This unit appears to be exempt from Rule 201 requirements pursuant to Rule 285 (2)(g) because its heat input is less than 10MM Btu/hour.

I left the facility at around 10:30 am.

Compliance Determination

Observations made during my inspection and record review indicate that Lee Transportation, Lee Machinery Movers, and Lee Industrial Contracting, Inc. is operating in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules.

NAME Adam Bogart

DATE 7/30/2019 SUPERVISOR SK