

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

A291324713

FACILITY: Brio Development (leasing space to Key Plastics)		SRN / ID: A2913
LOCATION: 1450 McPherson Park, HOWELL		DISTRICT: Lansing
CITY: HOWELL		COUNTY: LIVINGSTON
CONTACT: George McLaughlin, Health, Safety & Environmental Coordinator		ACTIVITY DATE: 03/18/2014
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection of facility which was last inspected by the Air Quality Division in 2008, when it was owned and operated by International Paper.		
RESOLVED COMPLAINTS:		

On 3/18/2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Brio Development's industrial/commercial structure at 1450 McPherson Park Drive, in which they have leased space to Key Plastics LLC.

Environmental contacts:

Tim Lane, Manufacturing Engineering Manager, Key Plastics L.L.C.; 517-546-1900, ext. 25296;
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George McLaughlin, Health Safety & Environmental Coordinator, Key Plastics L.L.C.; 517-546-1900, ext. 25238; gmclaughlin@keyplastics.com

Facility description:

The Brio Development site is assigned State Registration Number (SRN) A2913, which it received pre-2009, when it was owned and operated by International Paper Co., as a cardboard box manufacturing plant. The box plant closed in 2009. The new owner leases space to Key Plastics, and to Export Corp., inside. Key Plastics uses the space they lease for a warehouse, with some minor assembly of automotive parts taking place, as needed, while Export Corp. uses their leased space to run an industrial packing and shipping operation.

Regulatory overview:

As previously mentioned, this facility is assigned SRN A2913. This SRN is associated with Permit to Operate (PTO) No. 226-79, for a boiler capable of burning either natural gas or fuel oil. Key Plastics has no operational control over the boiler, and it is believed that the boiler was removed from the building. Key Plastics has no industrial processes in the leased space other than minor part assembly operations, which are described as having no air emissions. The requirement of Michigan Air Pollution Control Rule 201 to obtain a permit to install does not appear to apply.

Because the Brio Development site is contiguous and adjacent to part of the site of the Key Plastics Howell plant, SRN N2148, it is necessary to consider the definition of a stationary source, from Rule 119 (r), below:

(r) "Stationary source" means all buildings, structures, facilities, or installations which emit or have the potential to emit 1 or more air contaminants, which are located at 1 or more contiguous or adjacent properties, which are under the control of the same person, and which have the same 2-digit major group code associated with their primary activity. In addition, a stationary source includes any other buildings, structures, facilities, or installations which emit or have the potential to emit 1 or more air contaminants, which are located at 1 or more contiguous or adjacent properties, which are under the control of the same person, and which have a different 2-digit major group code, but which support the primary activity. Buildings, structures, facilities, or installations, are considered to support the primary activity if 50% or more of their output is dedicated to the primary activity. Major group codes and primary activities are described in the standard industrial classification manual, 1987. Notwithstanding the provisions of this subdivision, research and development activities, as described in R 336.1118, may be treated as a separate

stationary source, unless the research and development activities support the primary activity of the stationary source.

Because the Brio facility, SRN A2913, has or had an associated emission unit, the natural gas and/or oil-fired boiler, which is or was under the control of a different person than the Key Plastics Howell plant (SRN N2148), it is not considered to be part of the same stationary source from the Howell plant.

Because the Key Plastics minor assembly activities are described as having no emissions, the potential to emit (PTE) for the Key Plastics activities in the Brio Development building appears to be 0 tons per year for criteria as well as Hazardous Air Pollutants. Therefore, the Key Plastics portion of this site appears to be a minor, rather than major, source of emissions.

Emission units:

Natural gas and/or fuel oil-fired boiler; PTO No. 226-79; not under control of Key Plastics

Miscellaneous minor assembly processes reported to have no emissions; not subject to Rule 201

Recent history:

International Paper Co. closed its plant here in March, 2009. Export Corp. now leases 90,000 square feet of space in the building from Brio Development, according to a 9/6/2013 news article (attached for reference). Key Plastics leases about 79,000 square feet of space in the structure, following an increase in business at the Key Plastics Howell plant.

Fee status:

This facility is not a major source for criteria Pollutants or Hazardous Air Pollutants, and so is not considered a Category I source for fees. Also, it is not subject to any federal New Source Performance Standards, so it is not considered a Category II fee source. Nor is it subject to any federal Maximum Achievable Control Technology Standards, so it is not considered a Category III fee source. Finally, it is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting Systems (MAERS).

Location:

The former International Paper building is located in an industrial park, on the west side of Howell. About 500 feet to the northeast is the Key Plastics Howell plant, with a subdivision further north. About 500 feet to the northwest and north northwest are the Thai Summit (formerly Ogihara) and Chem Trend plants on McPherson Park Drive. Several hundred feet or more to the east are a number of industrial operations. Several hundred feet to the south is I-96, with a residential neighborhood beyond that.

Arrival:

I arrived at the offices of Key Plastics, across the street at the Howell plant, at 1301 McPherson Park Drive. I met with Mr. Tim Lane, Manufacturing Engineering Manager, and Mr. George McLaughlin, Health Safety & Environmental Coordinator. I provided them with the DEQ brochure "Environmental Inspections: Rights and Responsibilities," per AQD procedure. We inspected the Howell plant (documented in a separate activity report) before walking over here, to inspect the Key Plastics leased space, including the warehouse and minor assembly operation.

Inspection:

No visible emissions or odors were detected coming from the building. Weather conditions were about 40 degrees F, sunny, and clear, with winds out of the southeast at 5-10 miles per hour.

It was explained that Key Plastics ships finished auto parts from the Howell plant out of this building, and they bring component parts into the building. They also store tools and dies here.

Natural gas and/or oil-fired boiler, PTO No. 226-79:

As previously mentioned in this activity report, Key Plastics does not have any operational control over the boiler, and believes that it was actually removed from the building completely. AQD will contact Brio

Development, to verify the status of the boiler, and void the boiler's Permit to Operate, if it is no longer at the site.

Miscellaneous minor part assembly operations:

None of these appeared to be running at the time of the inspection. They are for service parts, for vehicles which are no longer in production, so they operate very infrequently. They might run 1-2 times per week, or per month. These assembly processes should not have emissions, I was informed, as no machining or coating of parts takes place.

Conclusion:

I could not find any instance of noncompliance, nor any areas of concern. The leased space for the Key Plastics warehouse and minor assembly area appeared to be clean and neat. Facility staff were very knowledgeable and helpful.

An Internet search for Brio Development did not provide a working phone number for them, so the status of the boiler is unknown, at this time.

NAME 
BK

DATE 4/7/2014

SUPERVISOR 