

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

B881527329

FACILITY: Clawson Tank Company		SRN / ID: B8815
LOCATION: 4701 White Lake Rd, CLARKSTON		DISTRICT: Southeast Michigan
CITY: CLARKSTON		COUNTY: OAKLAND
CONTACT: Terrance Groh, Owner		ACTIVITY DATE: 07/30/2014
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced self-initiated level 2 inspection.		
RESOLVED COMPLAINTS:		

On July 30, 2014 Air Quality Division (AQD) staff Rem Pinga and I conducted an unannounced, self-initiated level 2 inspection of Clawson Tank Company (Clawson Tank) located at 4701 White Lake Road in Clarkston, MI, 48346. The purpose of the 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, 1994 PA 451, as amended, and the conditions of Permit to Install (PTI) No. 546-96.

Ms. Jackie Rennie provided records, and Mr. Terrance Groh, Owner, provided a site walkthrough and explained equipment and operations. The previous Plant Manager and environmental contact, Mr. Don Chisholm, retired. Mr. Pinga and I presented our credentials and provided Mr. Groh with a copy of "DEQ Environmental Inspections: Rights and Responsibilities."

Clawson Tank manufactures shop-fabricated steel and fiberglass tanks. These tanks range in size from 5000 to 50,000 gallons. PTI No. 546-96 covers the fiberglass lay-up operation. The permit limits hazardous air pollutant (HAP) and volatile organic compound (VOC) emissions of Clawson Tank so they can opt-out of obtaining a Title V permit.

Site Walkthrough

Mr. Groh led us through the facility, focusing on equipment covered under the permit. There was no odor in the facility or particulates observed during the process. Tank fabrication, painting, and machining all occur in one large building. Fiberglass lay-up operations occur in a separate building. According to Mr. Groh, there are no boilers, emergency generators, or cold cleaners on site.

Tank Fabrication Area

Steel arrives in flat sheets. In the fabrication area, a large rolling machine loops the flat steel into the desired diameter shaft for the tank, and these tubes are welded together to a desired length. Similarly the curved heads of the tank are rolled up in the fabrication area. Finally, the curved heads of the tank are welded to the shaft, and a complete single-layer steel tank is formed. The large rolling machine appears to be exempt from permitting requirements via Rule 285(vi)(B), and the welding equipment appears to be exempt from permitting requirements via R 285(i).

After tank construction, grit blasting smoothes the tank. The grit blaster was not operating during our inspection. Emissions from grit blasting are controlled by fabric filters, replaced as needed, from which grit is reclaimed. Filters were in place and appeared to be operating properly. The grit blasting appears to be exempt from permitting requirements via R 285(vi)(B).

Paint Area

If a tank is single-layer, painting occurs after grit-blasting. Otherwise the tank will go straight to fiberglass lay-up operations. The paint booth is totally enclosed and has sheet filters in place. They are replaced as needed and appear to be operating properly. Records of paint usage are included in the overall VOC and HAP emissions for the facility. Paint usage is below 200 gallons a month; since January of 2014, the highest paint usage for a month was 155 gallons in January. Painting appears to be exempt from permitting requirements via R 287(c).

Machine Shop

The machine shop houses large steel fabrication equipment including a hole punch, shear, burn table, and press brake, which all exhaust indoors. According to Mr. Groh, a cold cleaner that was present in 2010 has been removed off site. The equipment appears to be exempt from permitting requirements via R 285(vi)(B).

Fiberglass Lay-Up Operation (PTI No. 546-96)

Clawson Tank's double-lined tanks have an inner layer of steel and an outer layer of fiberglass. The process of applying the fiberglass layer to the steel occurs in a separate building that is completely enclosed and has exhaust filters in place as per PTI No. 546-96 Special Condition (SC) 20. These filters are replaced as needed and appear to be operating properly; no opacity was observed from the fiberglass lay-up operation as per SC 16.

To add the fiberglass layer, first a fine mesh is placed on the outside of the steel tank. Mylar, a clear plastic, is placed on top of the mesh. Fiberglass is placed on the mylar and a resin and styrene mixture is applied. Daily recordkeeping is kept by hand of the time the fiberglass lay-up operation is occurring, as is the quantity of resin, styrene, catalyst, and paint wax used, per SC 14. These records are transferred to an excel spreadsheet by Mr. Terrance Groh's son, Mr. Justin Groh.

The fiberglass cures for approximately 45 minutes. Tanks are not removed from the lay-up operations until dry as per SC 24. After curing, a vacuum is placed in the second layer to check for leaks, and holes are repaired. The final product is a double-walled tank with secondary containment.

Spent paint filters are disposed of in the dumpster as per SC 21, and disposal of waste materials is performed by Heritage-Crystal Clean LLC out of Taylor, MI as per SC 22, according to Mr. Justin Groh.

Recordkeeping

According to records, Clawson Tank appears to be below all applicable VOC and HAP limits. Mr. Justin Groh converts the daily hand-kept records to monthly information on Excel spreadsheets. On August 17th he provided me with HAP and VOC records from January of 2013 to June of 2014, as well as monthly 12-month rolling records of VOC and Styrene emissions the past few years, as required in SC 18 and SC 20.

Per SC 13 for VOCs, Clawson Tank has not exceeded its limit of 9 tons/year based on a 12-month rolling time period; the highest they've reached is 2.75 tons in May and June of 2014.

Per SC 14, Clawson Tank is permitted for 621 lbs/hour of resin usage and got very close but did not exceed this limit at 618 lbs/hour on May 6, 2014. Their highest annual tons of resin usage based on a 12-month rolling time period were 32.65 in January of 2014, well below their limit of 138.45. The most hours they have operated the fiberglass lay-up operation has been 941 hrs in a year based on 12-month rolling time period. This occurred in July of 2013. This is below their 2545 allotted operation hours per SC 15.

Per SC 19, Clawson Tank HAP emissions are limited to 9 tons/year of a single HAP emission and 22.5 tons/year of all HAPs, and have emitted at most 2.39 tons/yr of a single HAP and 5.53 tons of net HAPs in January of 2014.

Compliance Determination

Based on our inspection, it appears that Clawson Tank is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of Permit to Install (PTI) No. 546-96.

NAME  DATE 9/30/14 SUPERVISOR CJE