

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

N063947918

FACILITY: Orbitform Group		SRN / ID: N0639
LOCATION: 1600 EXECUTIVE DR, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Kevin Bouldrey , Quality & Manufacturing Engineer		ACTIVITY DATE: 02/21/2019
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled compliance inspection.		
RESOLVED COMPLAINTS:		

Minor Source: Scheduled Inspection of Orbitform**Facility Contacts:**

Kevin Bouldrey – Quality & Manufacturing Engineer

Phone: 517-787-9447

Email: kbouldrey@orbitform.com

Website: orbitform.com

Purpose

On February 21, 2019, I conducted an unannounced compliance inspection of Orbitform, located at 1600 Executive Dr. Jackson, MI. I was accompanied by Diane Kavanaugh Vetort of the AQD Jackson Field Office. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act.

Facility Location

The facility is located in an industrial park within the city of Jackson. See Image 1 for an aerial photo.

Facility Background

Orbitform designs and builds assembly equipment for manufacturing. They build machines for a wide range of customers and industries, using processes like orbital riveting and fastening, roller forming, projection and resistance welding, assembly automation, and conveying systems.

The last inspection of Orbitform was conducted on March 17, 2011. At that time, the facility was found to be in compliance. AQD staff noted that they did not have many processes that required a Permit to Install (PTI), but that they did perform low volume spray painting of machines using a dry filter overspray control.

Regulatory Applicability

There are no active permits on file with AQD for this facility.

Arrival & Facility Contact

No visible emissions or odors were observed upon our approach to the facility. We arrived at approximately 10:32 AM, proceeded to the facility office to request access for an inspection, provided our identification, and met with Kevin Bouldrey, who is the quality and manufacturing engineer. A pre-inspection discussion was held with Kevin. We informed him of our intent to conduct a facility inspection and to review the various records as necessary. He extended his full cooperation, accompanied us during the full duration of the inspection, and fully addressed our questions.

Pre-Inspection Meeting

Kevin outlined that the facility is currently running one shift, and that they employ approximately 110 people. He indicated that their business is growing.

Kevin informed us that safety glasses were the only PPE required.

Onsite Inspection

Kevin proceeded to guide us on a tour of the facility. We started by entering into the main manufacturing area. This is where most of the machines and robotics are located and where a majority of the building and manufacturing of the parts occurs. All of the processes observed here have little to no exhaust, exhaust in-plant, and are not subject to a PTI requirement.

Next, we entered the area that houses the two spray coating booths (Image 2). Each spray booth has its own enclosure and designated exhaust (Image 3), and they are each equipped with a dry filter control (Image 4). Kevin explained that the booths exhaust horizontally, so we stepped outside to look at the exhaust vents. Because of the location of the facility, there is little worry of exhaust impacting nearby occupants, but we did explain to Kevin that an uncapped, vertical exhaust is always the best option. We notified him that if complaints were to ever be received, this may be something that would have to be addressed.

Kevin then brought us around to the area where the cold cleaner is located. He informed us that this is the only cold cleaner that they have, and that all waste is sent off-site to Safety Kleen. It is a small cold cleaner, and it is vented in-plant to its own control device (Image 5). During the time of the inspection, the lid was open. We informed Kevin that the lid should be closed when the parts are soaking and when the cleaner is not in use. We also gave him a copy of the cold cleaner operating procedure instruction stickers for further information.

We visited the electrically heated heat treat process next (Image 6). Kevin explained that they use 2 types of metals in the process, and that the process is air quenched and not oil quenched.

The last process that we observed was the welding area. This is an indoor area where welding projects are managed. At the time of the inspection no welding was occurring.

Recordkeeping Review

Attachments 1-16 are the SDS provided by Kevin for all paints, solvents, and thinners used in their spray coating booths.

Attachment 17 shows the purchase records for the materials used in the spray booths in 2018.

Attachment 18 is an email from Kevin on March 7, 2019 stating that the facility has already implemented a log sheet in the spray coating booths to keep records for the Rule 287(2)(c) exemption.

The records show compliance with permit exemption Rule 287(2)(c). The company shows as having only purchased 145 gallons of all products for the year 2018. This alone is below the 200 gallon per month requirement outlined in Rule 287(2)(c)(i). If you break that down by month and assume that what the company purchases is what they use, then they are only using approximately 12 gallons per month between the two booths.

Post-Inspection Meeting

We held a brief post-inspection meeting with Kevin. We discussed the records that would be needed to determine compliance and when they would be expected by. We requested the SDS for all materials used in the spray booth, as well as the purchase records for these products for the past year. We also went over the PTI exemption handbook and discussed the exemptions that relate to the processes that we observed. We explained that the spray booth exemption indicates that coating use records be maintained, so we advised him to start keeping those records.

Kevin then asked about how to proceed if the company continued to expand beyond the point of the exemption limits. We explained to Kevin the PTI process and that a PTI application would need to be submitted before the company began operating beyond the capacity of any given PTI exemption rule. We proceeded to provide him with some direction on where to find information related to PTI materials and PTI workshops provided by the DEQ.

Lastly, we told Kevin that a report would be filed documenting the findings from the inspection, and a copy would be sent to the company.

We thanked Kevin for his time and cooperation, and we departed the facility around 11:22 AM.

Compliance Summary

Permit exemption Rule 287(2)(c) applies to the two spray coating booths.

Permit exemption Rule 281(2)(h) applies to the cold cleaner.

Permit exemption Rule 282(2)(a)(i) applies to the heat treat process.

Permit exemption Rule 285(2)(i) applies to the welding process.

Based upon the facility inspection, review of the records, and review of applicable requirements the company was found to be in compliance at the time of this inspection.

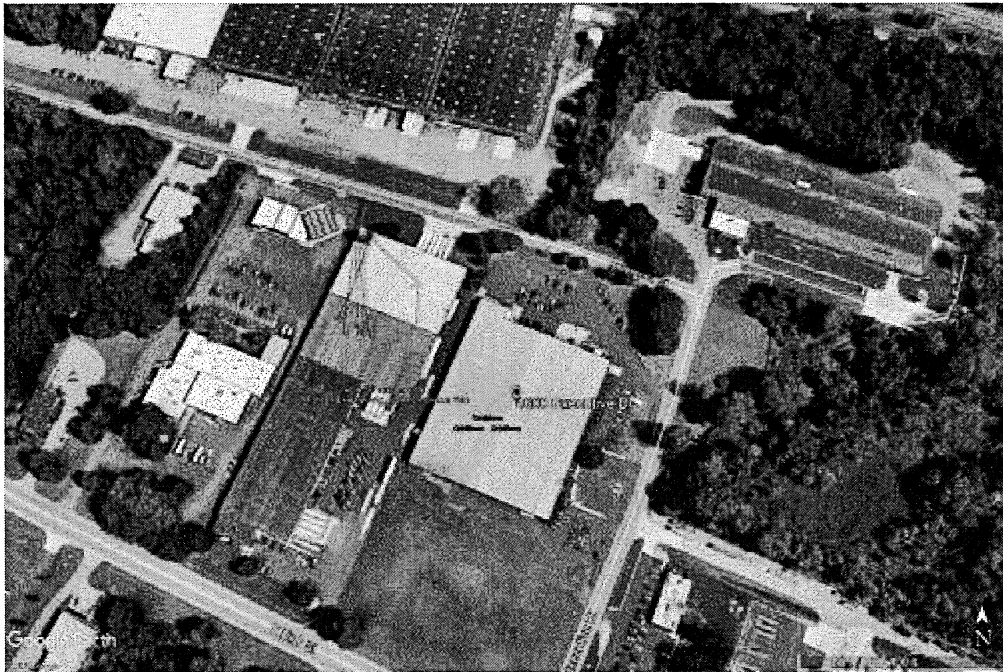


Image 1(Location) : Aerial view

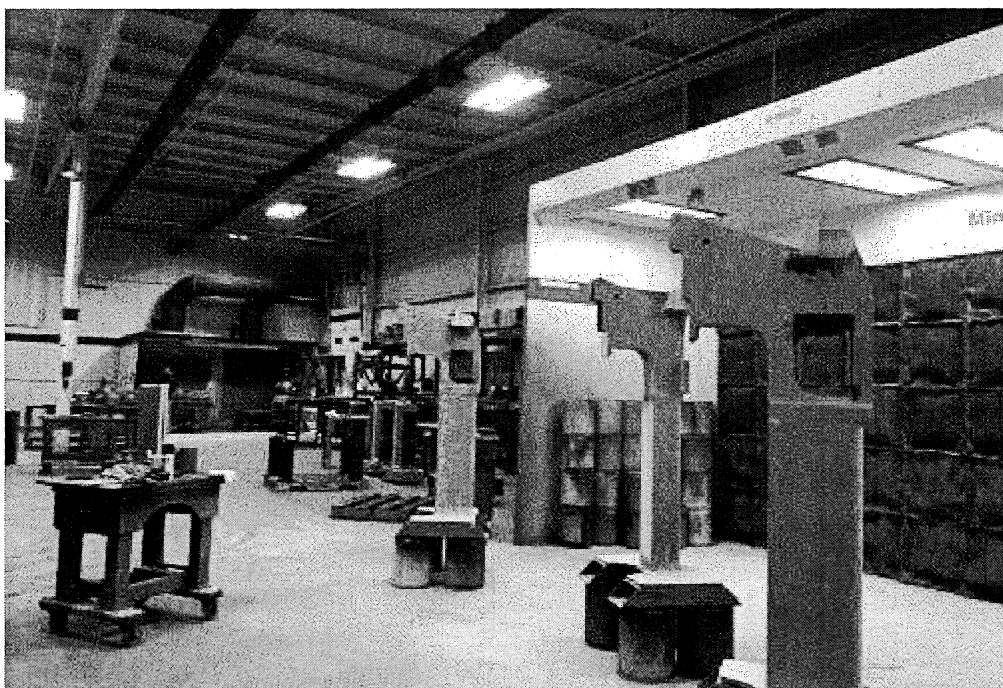




Image 3(Exhaust) : View of spray booth exhaust stack

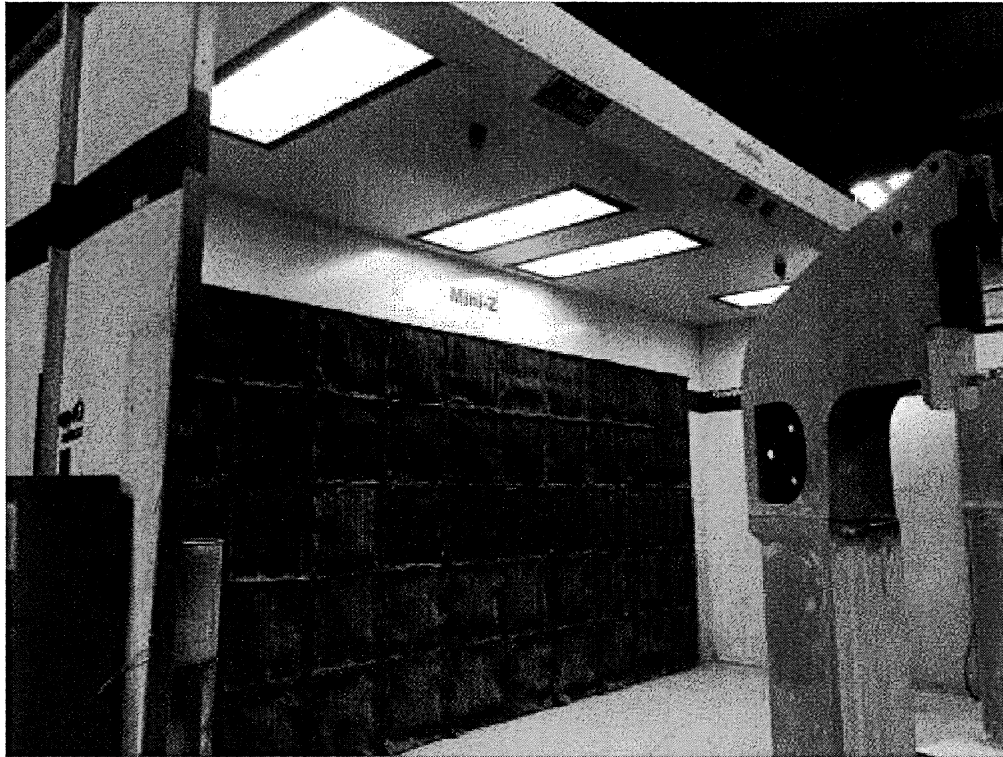


Image 4(Spray Booth) : View of filters in spray booth

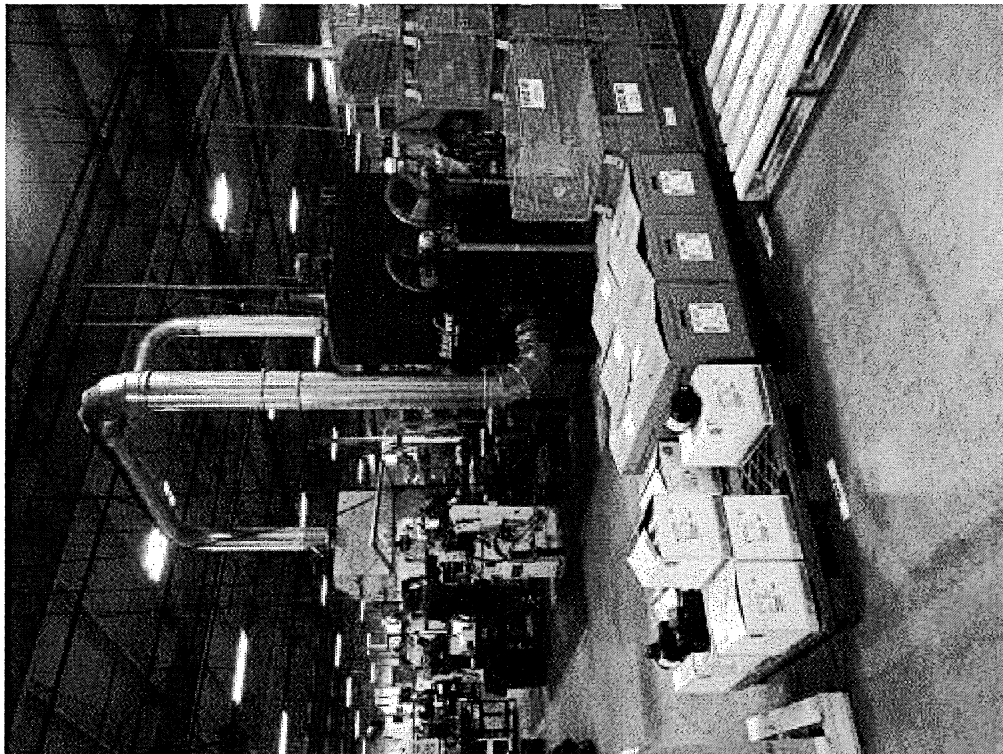


Image 5(Cold cleaner) : View of cold cleaner control device

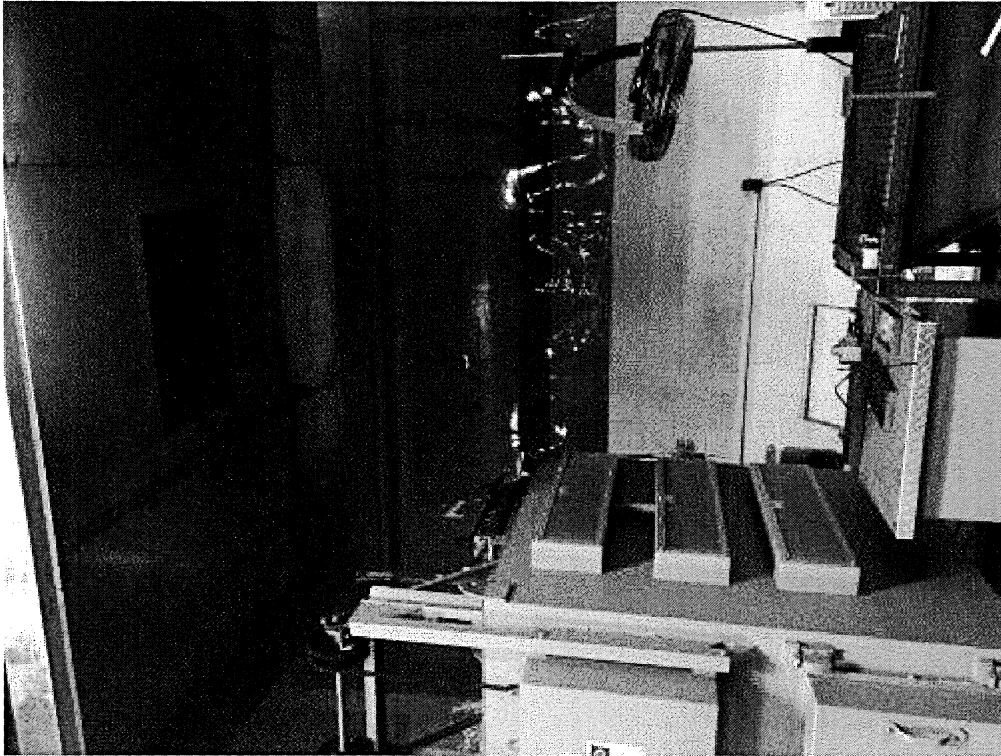


Image 6(Heat treat) : View of heat treat process

NAME Stan Weems

DATE 3.7.19

SUPERVISOR [Signature]