

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

N272343423

FACILITY: Odyssey Industries		SRN / ID: N2723
LOCATION: 3020 INDIANWOOD, LAKE ORION		DISTRICT: Southeast Michigan
CITY: LAKE ORION		COUNTY: OAKLAND
CONTACT: Kyle Gagnon , Health and Safety Coordinator		ACTIVITY DATE: 02/08/2018
STAFF: Robert Joseph	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of facility		
RESOLVED COMPLAINTS:		

On Thursday, February 8, 2018, I, Michigan Department Environmental Quality-Air Quality Division staff Robert Joseph, conducted an unannounced inspection of Odyssey Industries located at 3020 Indianwood Road, Lake Orion, MI 48362. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules and conditions of the facility's Permit to Install No. 161-16.

I arrived at the facility before 11am and met with the facility's Maintenance Engineer, Duane, and the Health and Safety Coordinator, Kyle Gagnon. I introduced myself and presented my identification and credentials and stated the purpose of my visit. I asked Kyle the nature of the facility's business and he indicated the facility prepares aircraft parts for organizations such as Boeing and NASA. The facility runs its operations around the clock and employs over 200 employees. Both Kyle and Duane accompanied me as I toured the following processes.

EU-PlasmaTable

The facility's Permit to Install No. 161-16 pertains to the Plasma Table emission unit. This unit is subject to an elevated temperature in which the cutter within the unit uses Argon gas to create an electric spark. This heats the gas until the material being cut has reached a plasma state thus creates slag within the metal allowing it to be cut. Grade A36 Steel and an Invar Alloy are typically the materials cut on the table. The table contains water underneath it which is continually recycled within itself which carries away the sludge. The resulting emissions are vented to the outside environment through to a dust collector containing a filter which oscillates as it drops particulate matter onto the filter.

This exhaust system is different than what is listed in the permit. The permit lists two (2) wall fans A and B. These have been decommissioned by the facility. The current dust collector exhaust system was installed last year by the facility in-place of the wall fans and is more efficient at capturing fugitive emissions. This change is exempt per;

R 336.1285 Permit to install exemptions; miscellaneous.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(f) Installation or construction of air pollution control equipment for an existing process or process equipment if the control equipment itself does not actually generate a significant amount of criteria air contaminants as defined in R 336.1119(e) or a meaningful increase in the quantity of the emissions of toxic air contaminants or a meaningful change in the quality and nature of toxic air contaminants.

The facility is required to document the number of cutting hours per month, and for a 12'

month rolling time period for materials cut containing a chemical composition of more than 1% Nickel. Nickel is an element when combined with other environmental containments becomes highly toxic when creating Nickel compounds. The cutting hours must not exceed 2,756 hours per rolling 12-month period.

VI. Monitoring/Recordkeeping

(Special Condition #2): SDS sheets show the A36 rolled steel consists of 0.01 to 3.5% Nickel, as well as the % weight of other chemical constituents. The Invar Alloy indicates a content of 36% Nickel which is the PTI material limit.

(Special Condition #3): The Plasma Table cutting time currently is 435 hrs. which is below the permit limit of 2,756 hrs.

(Special Conditions #4 and #5): All maintenance activities are logged regarding the collection hood and dust collector. The Plasma Table was not in use this day so no visible emissions could be verified from escaping the collection hood.

EU-Paint Booth

In addition, the facility also operates a paint booth utilizing a high volume low pressure (HVLP) applicator. The booth contains filters which are located within a two (2) exhaust units which vent to the outside via two (2) stacks. The filters are replaced based on pressure drop gauge within these units. The facility disposes of the filters themselves upon replacement. Per the facility's purchase records, the booth is exempt from a permit per;

R 336.1287 Permit to install exemptions; surface coating equipment.

Rule 287. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(c) A surface coating line if all of the following conditions are met:

(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.

(ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

The facility's purchase records indicate a rolling 12-month total of 923 gallons with no month exceeding 200 gallons of combined usage of paints, solvents, or cleaners.

EU-Sandblasting

Also, the facility operates a sandblasting booth which operates via a blast gun prepping the metal before being coated. The sand blast cleaning material used is a virgin BCA abrasive aggregate sand and is vented within the booth itself. This is exempt per;

R 336.1285 Permit to install exemptions; miscellaneous.

Rule 285. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(I) The following equipment and any exhaust system or collector exclusively serving the equipment:

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(B) Equipment that has emissions that are released only into the general in-plant environment.

Other operations

Lastly, the facility operates large-sized equipment used for rolling, forging, pressing, and bending metals for parts. This equipment is operated manually or through programmed commands. These processes are exempt per;

R 336.1285 Permit to install exemptions; miscellaneous.

Rule 285. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(I) The following equipment and any exhaust system or collector exclusively serving the equipment:

(i) Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals.

Conclusion

This completed my tour of the facility's operations. I thanked both Kyle and Duane for their time and I left the facility shortly after 3pm. Based on the AQD inspection and records review, it appears that Odyssey Industries 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 PTI 161-16.

NAME Robert Joseph

DATE 02/28/18

SUPERVISOR SK