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

N356024100

FACILITY: Lapeer Industries Inc., Plant 4		SRN / ID: N3560
LOCATION: 3140 JOHN CONLEY DR, LAPEER		DISTRICT: Lansing
CITY: LAPEER		COUNTY: LAPEER
CONTACT: Barry Shelton , Director Health and Safety		ACTIVITY DATE: 10/03/2013
STAFF: Brian Culham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Make initial contact. determine compliance. Investigate ongoing odor complaints.		
RESOLVED COMPLAINTS:		

Barry Shelton - Dir. Health and Safety – barry.shelton@lapeerind.com

This was an unannounced scheduled inspection. It also served as an investigation of an odor complaint received related to activities in the area. This was also an initial contact for me.

Plant 4 of Lapeer Industries is located in an industrial park southwest of the city of Lapeer. The area surrounding the industrial park is primarily agricultural and recreational land. A residential area exists about 1 mile to the west and a school about ½ miles to the north. The Interstate, I-69, is to the south.

Plant 4 of Lapeer Industries is a metal fabrication shop with a surface coating line. The plant fabricates welded components by cutting, welding, and grinding, steel. The products being welded are large structural components. Some painting of finished components is required.

There are multiple locations of Lapeer Industries in Lapeer but none are contiguous to Plant 4. The criteria pollutants Fine Particulate Matter (PM₁₀) and Volatile Organic Compounds (VOC) are emitted in the greatest quantities, but neither is expected to exceed 10 tons annually. Therefore, Lapeer Industries is considered a True Minor Source of all criteria pollutants. Lapeer Industries is also considered an Area Source of Hazardous Air Pollutants (HAPS) as well. The plant is likely not subject to MACT Subpart XXXXXX because they are primarily engaged in an activity that is not one of the nine identified categories. The plant could be subject to MACT subpart HHHHHH if they use coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Plant 4 of Lapeer Industries does not presently report to the Michigan Air Emissions Reporting System (MAERS), nor are they required to.

No.	Emission Unit or Flexible Group	Description	Permit Number or Exemption	Comp. Status
1	EUWelding	Various welding and brazing operations.	Rule 285(i)	C
2	EUPaintLine	2 paint booths and cure ovens	Rule 287(c)	C

I met Barry Shelton at Plant 2 (see inspection report). I explained that I needed to inspect that facility and Plant 4 and that odor complaints have been received for both locations. I stated that I wanted to focus on the paint lines. B. Shelton escorted me through both plants. After inspecting Plant 2 the two of us drove together to inspect Plant 4

1. EUWelding

We walked past various welding cells. The parts were large welded structures of dimensional steel. I did not identify any machines that would not satisfy the Rule 285(i) exemption from the need to obtain a Rule 201 air use permit. Although I did not see any cutting or surface grinding activities, they would also be exempt from Rule 201.

2. EUPaintLine

There are two paint booths and curing ovens installed in a paint room in the plant. Both booths had adequate mat type overspray filters installed. An overhead monorail delivers the parts to the two booths and oven. Stacks exited through the roof. Some touch-up brush painting was occurring while I was inspecting the paint area, but no spray guns were in use. There was no paint odor.

This plant is using coating similar to Plant 2. The records of coating that were submitted to me at Plant 2 contained values for Plant 4 as well.

The records indicated that about 200 gallons of paint are being used annually in the two booths at this plant.

Odor

We left the facility at approximately 11:00 am. B. Shelton and I drove the area to evaluate odors. At the corner of Lake Neppesing and Davison Roads we experienced an odor. The odor was light and hard to characterize, but seemed to be a solvent. The impact area was small maybe 500' in diameter. This is over 1/2 mile from Plant 4. Meteorological data for that day indicated that the wind was SSE at 5 mph. The plant is ESE from the odor.

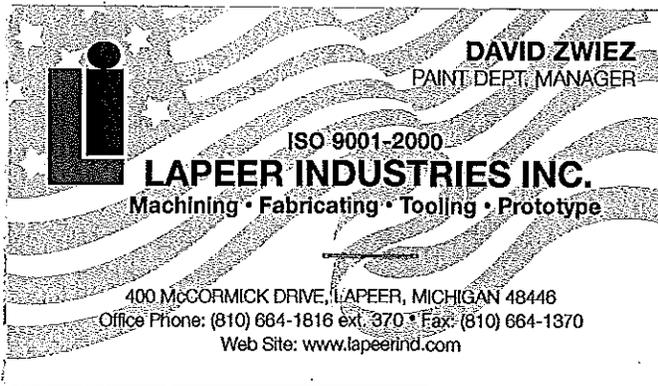
B. Shelton did not recognize the odor. The closest source was an automotive transmission repair shop. The odor did not track backward toward this business.

I returned to the area at 12:00. There were no odors.

The odor that I experienced did not have an intensity, duration, frequency, or range that would be adequate to determine an unreasonable interference of the comfortable enjoyment of life and property.

I did not identify any air quality violations during my inspection of the facility.

NAME Barry Shelton DATE 1-17-2014 SUPERVISOR M. Medda

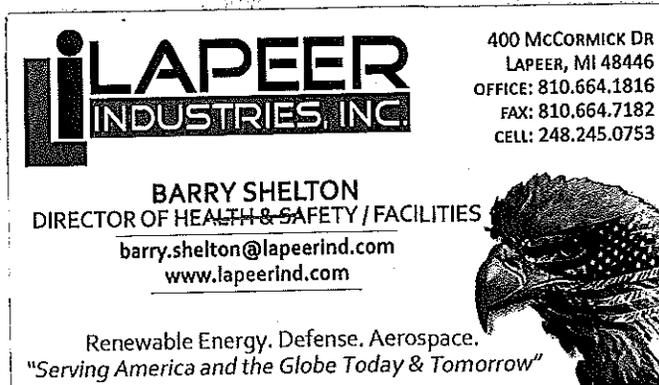


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PAINT DEPT. MANAGER

ISO 9001-2000

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