

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

N360949095

FACILITY: Arcosa Shoring Products, Inc.		SRN / ID: N3609
LOCATION: 685 HULL RD, MASON		DISTRICT: Lansing
CITY: MASON		COUNTY: INGHAM
CONTACT: Mason Tinch , Environmental Health and Safety Coordinator		ACTIVITY DATE: 04/23/2019
STAFF: Samantha Braman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection for compliance with PTI Nos. 911-92 and 1053-92.		
RESOLVED COMPLAINTS:		

N3609

This was an unannounced, scheduled inspection for compliance with PTI Nos. 1053-92 and 911-92.

Safety Equipment: Steel toed boots, safety glasses, hardhat, earplugs.

Facility Overview:

Efficiency Productions, Inc. manufactures trench support structures for construction contractors that work below ground level. Manufacturing at Efficiency Production consists of various types of metal cutting, machining, drilling, grinding, and welding. Primer and surface coats are applied to some of the products.

Environmental Contacts: Mason Tinch, Environmental Health and Safety Coordinator 517-676-7020; Austin Williams, Human Resources Manager; and Dale Bussa, VP of Manufacturing

Inspection:

I arrived at the facility at 9 am. There were no odors or emissions present at arrival.

I sat down with Mason, Austin, and Dale to discuss the reason for my visit. We discussed the permits and then they gave me a walk around the facility.

PTI No. 911-92:

This permit was for 3 paint booths with 3 downdraft paint filtration systems. The last inspection at this facility indicated that the three paint booths were never built and that the permit was to be voided due to construction not occurring within 18 months of permit issuance. Before arriving at the facility, I noticed that this permit did not get voided, and when I inquired at the facility about the 3 paint booths, I was notified by a long-term maintenance employee that the 3 booths were installed in 1992. They were unsure as to why past employee, Nedeltchev, had stated otherwise. Although filters, exhaust collections systems, or stacks were not identified in the 2009 AQD inspection I will not be voiding the permit due to the fact that the permit was never voided back in 2009, and the fact that the 3 paint systems were in place during my inspections.

During the inspection I witnessed the 3 painting areas, separated by curtains. All three had downdraft filters that I was told are replaced as needed or every 6 months. All three paint areas have their own stack, which I observed outside. Two of the stacks are on the roof and one is at the back of the building. The paint areas were not in use during my inspection, there were no visible emissions from the stacks. Paint areas were equipped with airless assist paint guns.

I notified Efficiency Production that if they wanted that they could potentially void their permit and operate under exemption. Even though they are most likely under the 200 gallons minus water per month of paint usage, they have opted to keep the permit in case they choose to increase production someday. Their current permit does not have any material limits, only limits VOC emissions.

The paints used at the facility are water-based paints. They all the same paint base, but with slightly different VOC contents. PTI No. 911-92 limits VOC emissions from all three filtration systems to 10.7 tons per year. I reviewed the VOC emission records and SDSs that were provided to me via email. The total annual VOC emissions for 2018 was 4,436 lbs, or 2.22 tons per year. This is well under their permitted limit of 10.7 tpy. Emission records can be found attached to this report.

PTI No. 1053-92:

This permit was issued to Efficiency Productions for MIG welding of steel and aluminum assemblies. A few years

after the issuance of permit #1053-92, Rule 285(i) was promulgated which exempted brazing, welding and soldering operations from the need for a Rule 201 permit. I explained that permit #1053-92 was not necessary and if Efficiency Productions wanted, we could void the permit. A written request from the company addressed to me is necessary to complete the void.

Permit #1053-92 contained two conditions, one which limited wire use to 25,000 lbs per month. Wire at this facility comes in 500 lb spools, and they told me they use about 8,000 lbs every 2 weeks. This would put them around 16,000 lbs per month, which is considerably lower than the permit limit.

The second was opacity restricted to 5% or less. There are no dedicated exhausts for the welding operations. There is an inside dust collector for the welders that intakes any dust/smoke from the equipment and outlets up near the ceiling back into the facility.

I left the facility at 10:50 am.

Conclusion:

Efficiency Productions appears to be in compliance with their PTI Nos. 1053-92 and 911-92, and all other state air regulations.

NAME Samantha Brianna

DATE 6/11/19

SUPERVISOR B.M.