

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

N517430915

FACILITY: LAWFORD FABRICATING CO INC		SRN / ID: N5174
LOCATION: 21650 WYOMING CT, OAK PARK		DISTRICT: Southeast Michigan
CITY: OAK PARK		COUNTY: OAKLAND
CONTACT: James Griffin, Owner		ACTIVITY DATE: 08/27/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Level 2 Self-initiated Inspection		
RESOLVED COMPLAINTS:		

On August 27, 2015, I conducted a level 2 unannounced inspection at Lawford Fabricating Co., Inc., Oak Park, Michigan 48237. The purpose of this 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 PA 451, as amended (Act 451); the administrative rules and the conditions of Permit to Install No. 108-94. During the inspection, I was accompanied by Mr. Douglas Sparks, facility/office manager. Mr. James Griffin, facility owner, was also at the facility. During the pre-inspection conference, I conducted the pre-inspection routine of showing my ID Badge, stated the purpose of my visit, and gave Mr. James a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities". The last time I was at the facility for inspection was in 2010.

PTI No. 108-94 was issued to the facility for the Zinc foundry process. The facility is permitted for 2 natural gas fired zinc melting furnaces rated at 1 MMBTU/hr with a maximum pouring rate of 60,000 lb/day. During the inspection, I observed one large, one medium, and one small furnace. Mr. Douglas mentioned that they are rated 20,000 lb., 10,000 lb., and 1,000 lb. per hour furnaces. The smallest furnace can be permit to install exempt per AQD Rule 282(a). Per PTI No. 108-94 special condition no. 16, the facility does not use fluxing material in the process. Per PTI No. 108-94 special condition no. 15, I did not observe any visible emissions during the inspection. At that time, the large furnace was operating and the smallest furnace was holding some molten metal. The facility utilizes styrofoam material to build the mold by cutting and digging out the foam to form the shape instead of melting. The mold itself is made from sand utilizing a resin binder called Alphathane that comes in 2 components. Per PTI No. 108-94 special condition no. 17, the company kept records of sand throughput, resin mixture usage, and Zinc poured. Per submitted records for January through July 2015, the facility used about 642 tons of sand. The facility utilized about 4 totes of resin 1 and 4 totes of resin 2. The Zinc melt was at 1168581 lb. or 584.3 tons.

The facility also submitted initial notification form for 40 CFR 63 Subpart ZZZZZZ, the area source MACT for Aluminum, Copper, and Other Nonferrous

Foundries. The facility determined that it is not subject to the MACT standard as the annual production is less than 600 tons.

Overall, I did not find any non compliance issues at the facility during inspection. It appears that the Zinc production may exceed 600 tons this year thus may trigger the MACT standard. I will make sure the facility is aware of this potential issue.

NAME

F. M. Ji

DATE

9/1/2015

SUPERVISOR

CJE