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

N519833939

FACILITY: UNIVERSAL HANDLING EQUIPMENT CO OWOSSO LLC		**SRN / ID:** N5198
LOCATION: 1650 INDUSTRIAL DRIVE, OWOSSO		**DISTRICT:** Lansing
CITY: OWOSSO		**COUNTY:** SHIAWASSEE
CONTACT: Craig McCorkle , Operations Manager		**ACTIVITY DATE:** 03/28/2016
STAFF: Daniel McGeen	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Partial Compliance Evaluation (PCE) activities, conducted as part of a Full Compliance Evaluation (FCE): 1.) unannounced, scheduled inspection, and 2.) review of facility recordkeeping.		
RESOLVED COMPLAINTS:		

On 3/28/2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an unannounced, scheduled inspection of Universal Handling Equipment Co. Owosso, LLC. This activity was a Partial Compliance Evaluation (OCE) activity, done as part of a Full Compliance Evaluation (FCE). Also discussed in this report is a review of facility recordkeeping, which is also a PCE activity.

Craig McCorkle, Operations Manager; 989-720-1650; cmccorkle@uhecl.com

Jim Rogers, Manufacturing Engineer; 989-720-1650; jrogers@uhecl.com.

Facility description:

This facility fabricates, primes, and paints steel containers, for the solid waste handling and recycling industries.

Emission units:

Emission unit	Emission unit description	Permit to Install (PTI) or relevant rule	Compliance status
Welders in Plant 4	Welding units within Plant 4 metal preparation department	Rule 285(i)	Compliance
Metal working activities in Plant 4	2 metal shears, 2 press brakes, well saw, drill press, 2 small grinders	Rule 285(I)(vi)(B)	Compliance
EUPAINTBOOTH	Shop building capable of functioning as one or two coating booths; controlled by mat/panel filters	PTI No. 239-06	Compliance
Plant 6	Storage	NA	Compliance

Regulatory overview:

This facility is considered a synthetic minor/opt-out source, because it has an opt-out permit, which restricts the facility's potential to emit (PTE) of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs), keeping it from becoming a major source. Major sources are required to obtain a Renewable Operating Permit (ROP). In 2000, this facility had been issued an ROP, but they decided to obtain an opt-out permit, Permit to Install (PTI) No. 239-06, rather than to renew the ROP after five years.

Because this facility is not a major source of HAPs, it is not subject to 40 CFR Part 63, Subpart MMMM, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulation for Surface Coating of Miscellaneous Metal Parts and Products.

Additionally, this facility is not subject to 40 CFR Part 63, Subpart XXXXXX, the NESHAP for Nine Metal

Fabrication and Finishing Source Categories. This is because it does not match the nine North American Industrial Classification System (NAICS) codes the regulation is targeted for. The NAICS code for this facility, as stated on their most recent Michigan Air Emission Reporting System (MAERS) report, is 332439, and represents "Other Metal Container Manufacturing".

Location:

The facility has two main buildings (Plants 4 and 6), with a paint shop building in between them. The site is located in an almost exclusively industrial area. About 190 feet to the north, directly across the street, is a small factory. North of that are another business, and a scrapyard. About 250 feet to the west is a small factory, and 500 feet further west are two smaller industries, with woods beyond. Approximately 300 feet to the northwest of the main building (Plant 4) is an office building for a Shiawassee County government agency. To the immediate south are undeveloped land, then a farm field. To the east are woodlands/meadows, and to the northeast are other industrial or commercial facilities. The nearest house appears to be about 800 feet to the southeast of the paint shop.

Recent history:

In late 2011, this facility closed, for several months. However, it was reopened, and began production again, on 6/15/2012.

MAERS and fee status:

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III. The facility is required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

Arrival:

At 12:52 PM, I drove past the facility, on Industrial Drive. I was immediately north of the site, and detected no odors. Weather conditions cloudy, and 45 degrees F, with winds 10 miles per hour out of the northwest. I drove downwind of the site, on Aiken Road, and still detected no odors. As I drove to the facility parking lot, I observed no visible emissions from the paint shop exhaust stack.

I met with Mr. Craig McCorkle, Operations Manager, who informed me that the previous environmental contact, Mr. Duane Conrad, is no longer with the company. I also met with Mr. Jim Rogers, Manufacturing Engineer. It was explained that this was an extremely busy week, being their inventory week, but they were nonetheless willing to make time for this unannounced inspection. I provided a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, and a copy of the Boiler MACT card, per procedures. I also provided a copy of the *PTI Exemption Handbook*.

PCE activity No. 1: Inspection:

The main building, where the plant offices are, is called Plant 4. Metal fabrication activities, such as cutting, grinding, and welding of steel, take place here. Behind it, to the south, is their paint shop building, where priming and painting are done. A few hundred feet to the east is Plant 6, which, I was informed, is just used for storage of materials and of containers which have been recently painted in the paint shop building, nearby.

Welding; Rule 285(i):

Rule 285(i) exempts welding activities from the requirement to obtain an air use permit. Plant 4's metal preparation department had a number of welding units.

Metal working activities; Rule 285(I)(vi)(B):

Plant 4's metal preparation department includes two metal shears, two press brakes, a well saw, drill press, and two small grinders. The processes exhaust into the general, in-plant environment. The two small grinding units are partially enclosed, and metal chips fall down enclosed funnels, into covered containers.

Rule 285(I)(vi)(B) exempts from the requirement to obtain an air use permit equipment for carving, cutting, routing, turning, drilling, machining, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening or polishing metals, if the equipment has emissions which are released only into the general in-plant environment.

Plant 6:

I was informed that there are no industrial activities taking place here, just storage of materials, and of containers which have been freshly painted in the nearby paint shop building.

EUPAINTBOOTH; PTI No. 239-06.

The paint shop building is situated just south of Plant 4. It is a large metal structure which can function as one or two paint booths, depending on their needs. This emission unit is designated as EUPAINTBOOTH, in the PTI. Both priming and painting are done here. It is my understanding that they use water-based primers, and use enamel paints for the topcoats. They use acetone as a clean up and purge solvent, as it is not a VOC.

An overhead door to the building was open at the time, as a painted container had just been removed. There was a barely detectable paint odor inside the building, still. In the east wall is a large bank of mat or panel filters, which provide particulate control. The filters appeared to be in very good condition. They are replaced every Friday morning, and this is documented on a filter replacement log form, each week. It is my understanding that the only case in which they would use filters for longer than one week is if they did an unusually low volume of painting that week. There was no sign of paint droplets on the exhaust stack.

PCE activity No. 2: Review of facility recordkeeping:

We reviewed their VOC and HAP-related recordkeeping, by reviewing tables (attached) which were submitted in early 2016 as part of their MAERS report for the 2015 operating year. I had recently audited this MAERS submittal, which was timely and complete, and passed the audit.

For calendar year 2015:

Primer use: 2,954 gallons

Primer VOC emissions: 2.23 tons

Enamel use for topcoats: 3,040 gallons

Enamel VOC emissions: 1.74 tons

EUPAINTLINE VOC limit: in PTI No. 239-06: 36.0 TPY

EUPAINTLINE 2015 VOC emissions from primer and enamel combined: 2.23 tons + 1.74 tons = 3.97 tons VOC, below permitted limit

Acetone use: 29 gallons

Acetone limit in PTI No. 239-06: 2.9 TPY

Acetone 2015 emissions: 0.10 tons, below permited limit

Note: acetone is not a VOC, and so does not count toward the facility's total VOC emissions.

Single HAPs limit in PTI No. 239-06: <9.0 TPY

Total HAPs limit in PTI No. 239-06: <22.5 TPY

Highest single HAP in 2015: 0.03 tons triethylamine, below permitted limit

Total HAPs in 2015: 0.04 tons, below permitted limit

For recordkeeping related to their painting and priming activities, I was informed that they are using a copy of the DEQ spreadsheet designed for this purpose, and that they switched to this spreadsheet in 2013.

I left the site at 1:26 PM. No paint odors or visible emissions were detectable, at this time.

Conclusion:

I could not find any instances of noncompliance. The facility appeared to be in compliance with their PTI No. 239-06, and with the Michigan Air Pollution Control Rules.

NAME _____ DATE _____ SUPERVISOR _____