

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

N532145782

FACILITY: LOUDON STEEL INC		SRN / ID: N5321
LOCATION: 8208 ELLIS RD, MILLINGTON		DISTRICT: Saginaw Bay
CITY: MILLINGTON		COUNTY: TUSCOLA
CONTACT: Gib Loudon , Plant Manager		ACTIVITY DATE: 08/21/2018
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On Tuesday (8/21/18) I (Matt Karl) conducted a compliance inspection at Loudon Steel Inc. located at 8208 Ellis Road, Millington, MI 48746. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Administrative Rules; and Permit-to-Install (PTI) No. 112-98. Mr. Gib Loudon, Plant Manager, assisted me during the inspection.

The facility assembles (welds) and paints steel parts racks for use in the automotive industry. The facility currently has approximately 30 employees and operates two shifts (06:00-16:30 and 16:45-03:15) four days a week. The facility is capable of assembling and painting approximately 60-70 racks per day. Priming of the parts racks is no longer done at this facility. A paint dip tank is rarely used on some orders but has not been used over the period of the records reviewed for this inspection. Painting of the parts racks is primarily performed in one large paint booth referred to as the "topcoat booth" using airless sprayers and a variety of water-based, direct to metal (DTM) paints. Purging of the sprayer lines before paint change is accomplished with water. Emissions are controlled from the paint booth using exhaust filters. The maintenance schedule for the exhaust filters is approximately weekly and as needed based on the production schedule. Replacement filters are kept on site.

While on site, I confirmed that material safety data sheets (MSDS) and records of emissions from the paint booth were being kept in a satisfactory manner (paper copies). I requested copies be scanned and sent to me via email. I received scans of the MSDS and records of emissions later that afternoon. Two additional MSDS were sent on Monday (8/27/18).

Records Review: January 2017- July 2018

PTI No. 112-98 limits the VOC emission rate from the topcoat booth to 8.4 TPY based upon a 12-month rolling time period as determined at the end of each calendar month. Over the period of the records review, the tons VOC emitted per 12-month rolling time period ranged from 1.52-1.75, which is well below the permit limit. Additionally, PTI No. 112-98 specifies that the VOC content of any paint used shall not exceed 3.47 lbs./gallon of coating (minus water) as applied. The paints used at this facility have VOC coating (minus water) content ranging from 1.81-3.45 lbs./gallon, which are below the permit limit.

None of the paints used at this facility contain HAPs (several do contain CAS 111-76-2 EGBE (2-Butoxyethanol) which was removed from the HAPs list in 11/29/2004 (69 FR 69320)).

During the records review it was noted that the material VOC content for paint 190-2168 WR LF NAO Blue FD Enamel was actually lower than the number being used in emissions calculations(0.86 lbs./gallon vs 0.61 lbs./gallon). This discrepancy was brought to Gib Loudon's attention.

Based on this inspection, the facility appears to be in compliance.

NAME Matthew L. Karl

DATE 8/30/18

SUPERVISOR C. Gore