

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N805664479

FACILITY: LAKE PAINTING, INC.		SRN / ID: N8056
LOCATION: 2877 VENTURE DR, MIDLAND		DISTRICT: Bay City
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: John Morse , Safety & Env. Director		ACTIVITY DATE: 08/17/2022
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Facility Inspection		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (AQD) met with John Morse of Lake Painting. John is the Safety and Environmental Director. Lake Painting is a job shop operation which concentrates on metal industrial and commercial work. Abrasive blasting is also conducted in which steel shot or sand is used.

The facility has one air use permit, pti 165-08. It is a general coating permit and as such, only has limits for volatile organic compounds (VOC). The limits are 10 tons per 12 month rolling time period for each individual coating line and 30 tons for the overall facility. The permit application only covered the two newest paint booths. However, the 30 ton limit for the facility would include all coating operations.

Painting occurs in one of two buildings. One building is located on the west side of the site. It has three booths (south, middle, north). The booths are the oldest ones and basically consist of segregated portions of the building. Separate stacks and ventilation are provided. A mixing / cleanup area is also present. Painting was occurring only in the south booth. Filters were in place though the buildup on them clearly indicated they needed to be changed. Basic booth operation and filter change was discussed with John. High volume low pressure (HVLP) spray equipment is used. Airless painting systems are also available. There are no traditional paint cure ovens. If needed, heat can be provided to booths to aid in curing during colder months or to accelerate curing to facilitate production time requirements. Enamel paints are the type typically used in this building.

The two newest painting areas are found in a building located on the northwest portion of the site. The installation of these booths were the reason for obtaining the permit in 2008 and the ones covered by it. These painting areas are more traditional spray booths. The booths here are known as east and west. The coatings and application equipment are the same as the other building. Filters were in place, though like the other building, they need changing. Epoxy paints are the type sprayed in this building. Heat, up to 130 degrees fahrenheit, can be provided to the booths to facilitate curing. No traditional paint cure ovens are present.

Shot blasting occurs in another building located just east of the newer painting operations. It houses a blast area / booth where most items are blasted prior to painting. The booth has its own ventilation system which routes the exhaust outside where it is controlled by a bag house. The blast area was in use at the time. A control panel has a high / low pressure alarm system for monitoring the bag house. The company also employs a recycling system, prior to the bag house, which recovers steel shot for subsequent reuse. It is located inline prior to the

baghouse. The shot blasting operation is exempt from air permitting via rule 285 (2)(l)(vi)(c).

There is a maintenance / storage building located east of the blast building and northeast of the office area. It contains a unit for solvent recycling. It is a small batch unit of approximately 5 gallons. This allows the company to recycle much of its solvent and the waste is collected by a disposal firm. The unit is exempt from air permitting via rule 285(2)(u) as it has less than a 55 gallon capacity. A small cold cleaner is also present. I informed John of the cold cleaner rules and told him I would furnish links to the relevant rules and also provide stickers for labeling / operation. On the north end of the building there is an area where sand blasting can take place. It appears to be rarely used. A moveable curtain is present on the north end. It allows parts to be moved in while functioning as a barrier to keep particulate matter inside when the curtain is closed and blasting is being done. The sand blasting operation is exempt from air permitting via rule 285 (2)(l)(vi)(c).

Records were checked in the office area. Records required by the permit were not available. However, employee time records were available which indicated the type of paint, solvent etc. and usage amounts for each day. I took time to explain the permit requirements and the minimal amount of effort it would take to compile the records. I also explained the concept of the 12 month rolling time basis stated in the permit when dealing with tonnage limitations. While discussing the compilation and keeping of records I pointed out the products and their formulations used at one point should be reflected in the emissions for that time. Any new information should not be going back and changing the past.

The three booths in the original building (a.k.a. south, middle, and north booths) were exempt from permitting via rule 287(2)(c). They were in place and exempt prior to December 20, 2016 therefore the permit exemption at that time remains applicable. The requirements are the coating usage rate is not more than 200 gallons as applied, minus water, per month, the exhaust systems having a properly installed and and operating particulate control system, and monthly coating use records are available for the most recent 2-year period. As stated above, the only records available at the time were the employee time records. Though not tabulated on a monthly basis it did not seem likely the usage would approach 200 gallons per month per line. There is no stack height requirement in rule 287c.

On August 18, 2022 a series of separate emails were sent to John which provided the individual exemptions stated above, cold cleaner rules, and a clean copy of the facility air permit. The sticker labeling for the cold cleaner was sent via the US Postal Service.

On September 9, 2022, John confirmed he had not yet compiled the records required by the general permit 165-08 for the east and west booths. This is a violation of the record keeping requirements. Likewise, the records required by rule 287(2)(c) for the south, middle, and north booths were still not available thereby resulting in an additional violation.

NAME B. Zanthoff

DATE 9-15-22

SUPERVISOR C. Hale

