

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

P030164024

FACILITY: STATE FABRICATORS, INC.		SRN / ID: P0301
LOCATION: 30550 W 8 MILE, FARMINGTN HLS		DISTRICT: Warren
CITY: FARMINGTN HLS		COUNTY: OAKLAND
CONTACT: Roy Rodriguez , Facilities Manager		ACTIVITY DATE: 07/13/2022
STAFF: Noshin Khan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: announced inspection		
RESOLVED COMPLAINTS:		

On Wednesday, July 13, 2022, I (Noshin Khan, EGLE-Air Quality Division) performed a scheduled, announced inspection of State Fabricators, Inc., located at 30550 West 8 Mile Road, Farmington Hills, Michigan 48336. The purpose of the 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 (PTI) No. 1416-91A. Upon arrival, I met with Roy Rodriguez, Facility Manager, and stated the purpose of my visit. I did not observe any visible emissions at the facility during my inspection, which indicates compliance with R 336.1301 and EUSPRAYBOOTH Special Condition (S.C.) I.3 in PTI 1416-91A.

The facility performs metal fabrication and manufactures metal carriers, skillets, and skids. Roy began the facility walkthrough by taking me through the main building which includes Plant 1. Here, I observed metal fabricating operations including welding and cutting. Roy showed me a CNC installed in 2021, for which tubing is currently being used to direct emissions into the plant environment. Next, Roy showed me Plant 2 where staging of materials and more machining is performed. Machining and welding operations are exempt from permit to install requirements per AQD Administrative Rules R 336.1285(2)(l)(vi) and R 336.1285(2)(i & j), respectively.

After this, we visited the paint shop, which is a separate building utilized as a spraybooth. I observed filters in place that appear to be operating properly, in compliance with EUSPRAYBOOTH S.C. IV. These filters are replaced every few weeks and monometers test the pressure to ensure positive exhaust. Roy showed me the secondary filters on the roof, which catch particulate matter and are shaken out about weekly. Following this, we visited the paint mix room located in the same building. Here, paints, solvents, and gun cleaners are stored. I observed that paint and solvent containers were closed. Roy showed me 55 gallon drums in which waste solvent is stored outside of the paint shop. US Ecology collects this waste.

Finally, Roy showed me Plant 3, where staff assemble parts and apply details like paint, stickers, and stamps for special pallets. The storage and holding area is also located here.

According to EUSPRAYBOOTH S.C. VI, the facility is required to keep records for the usage rate and VOC content of each coating on file for a period of five years. EUSPRAYBOOTH S.C. I.1 specifies a VOC emission limit of 15 lb/hr by testing per general condition (GC) 13. It does not appear that EGLE-AQD has required the facility to perform testing for compliance with this condition. EUSPRAYBOOTH S.C. I.2 specifies a monthly 12-month rolling VOC emission limit of 15 tpy.

According to FGFACILITY S.C. VI.1-2, the facility is required to keep usage rate and HAP content for each coating, and individual and aggregate HAP emission calculations on file for a period of five

years. FGFACILITY S.C. I.1 and I.2 specify individual HAP and aggregate HAPs monthly 12-month rolling emission limits of 9.0 tpy and 22.5 tpy, respectively.

Colleen Neal is currently handling record keeping for the facility. I asked Colleen to provide me emissions records for the period of June 2017 to June 2022. On August 18, 2022, Colleen sent me PDF files of emissions records for this period and noted that data has not been regularly updated in the facility's emissions spreadsheet. She added that she was previously the backup contact for updating the spreadsheet but is now responsible for this task. The records for 2019 to 2022 are missing monthly and 12-month rolling emissions for VOCs and individual and aggregate HAPs, in violation of EUSPRAYBOOTH S.C. VI.1 and FGFACILITY S.C. VI.1 and VI.2.

Since the facility has not been properly maintaining records as to have them readily available and has not been recording monthly and 12-month rolling emissions, I am issuing a violation notice for noncompliance with EUSPRAYBOOTH S.C. VI.1 and FGFACILITY S.C. VI.1 and VI.2.

NAME 

DATE 08/30/2022

SUPERVISOR 