

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

U23161171637335

FACILITY: Midwest Press & Automation, LLC		SRN / ID: U231611716
LOCATION: 2904 Snow Rd		DISTRICT: Lansing
CITY: Lansing		COUNTY: EATON
CONTACT: Nick Martin, Service Manager		ACTIVITY DATE: 10/20/2016
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated inspection as part of a survey of the Canal Rd, Creyts Rd and Lansing Rd areas.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Nick Martin ([nickmartin@mpallp.com](mailto:nickmartin@mpallp.com)), Service Manager

Brittanie Dygert ([brittaniedygert@mpallp.com](mailto:brittaniedygert@mpallp.com)), Office Administrator

**Purpose:**

Conduct an unannounced, self-initiated compliance inspection to determine compliance with Michigan Air Pollution Control Rules, and also conducted as part of a survey of facilities within the Canal Rd-Creyts-Rd-Lansing Rd areas.

**Facility Background/Regulatory Overview:**

Nick Martin, Service Manager, said that Midwest Press services and repairs metal forming equipment for customers and for resale.

**Inspection:**

At approximately 1:06 p.m. on October 20, 2016, I met with Nick Martin and I explained to him that I was there to do an inspection as part of a survey of facilities in the area. I provided him with a July 2014 Permit to Install (PTI) Exemption handbook.

Table 1 contains a list of all equipment present onsite. N. Martin said Midwest Press has no emergency engines or boilers.

Table 1. Equipment

Emission Unit	PTI Exemption	Compliance Notes
One (1) Bandsaw Three (3) Surface Grinders Two (2) CNC lathes Two (2) CNC mills Four (4) Conventional mills Five (5) Conventional lathes One (1) Drill press	Rule 336.1285(l)(vi)	All equipment emissions are released to the general in-plant environment. Compliance
Welding	Rule 336.1285(i)	Compliance
Spray coating equipment	Rule 336.1287(c)	Compliance
One (1) Parts Washer	Rule 336.1281(e)	Compliance
One 300-gallon tote Mineral Spirits (CAS# 64742-47-8)	Rule 336.1290(a)(i) or (a)(ii)(A)	Compliance

**Exempt Equipment**

Midwest Press utilizes several hand-held paint spray guns for coating surfaces on repaired/refurbished equipment. All emissions from the painting are released to the in-plant environment. I explained to N. Martin the Rule 287(c) exemption and he showed me coating purchase records for August and September 2016. Midwest

Press purchased a total of 15 gallons of coating in August and a total of 14 gallons of coating in September (gallons include paint and primer). Midwest Press meets the 200 gallons/month based on these invoices.

N. Martin showed me the parts washer used to clean large pieces of machining equipment (remove oils, etc). It consists of a large open bay area enclosed partially on 3 sides. The spent cleaning solution is collected below the grates of the floor which N. Martin said is recirculated. He said that Stoddard services the equipment by disposing of and replenishing the cleaning solution (Zep Heavy-Duty High Alkaline Cleaner). Attached is the SDS for the cleaning solution. The solution does not contain any VOCs, therefore has a vapor pressure greater than 0.1 mmHg and would therefore meeting exemption Rule 281(e).

Midwest Press also has a 300 gallon tote containing Mineral Spirits. A spigot on the container allows employees to dispense what they need into a container and use a rag to wipe clean smaller machining parts. The EPA determines which chemicals are considered VOCs based on their definition of whether the chemical is photoreactive. A 2009 list compiled by the California Air Resources Board (CARB) does not list mineral spirits as a non-VOC; however the mineral spirits SDS states that mineral spirits are not considered a VOC by the CARB. Using Rule 290, Midwest Press would be limited to 1000 lbs of uncontrolled mineral spirits emissions per month whether it was considered a non-carcinogenic VOC (Rule 290(a)(i)) or noncarcinogenic non-VOC (Rule 290(a)(ii)(A)). The ITSL for mineral spirits is 24 ug/m<sup>3</sup>. Mineral Spirits usage from this tote would be exempt under either Rule 290 subpart. Brittanie Dygert, Midwest Press' Office Administrator, said that for 2016 they ordered 1 300-gallon tote of mineral spirits in January, and another one at the end of July. She said that right now they're almost halfway through the 300 gallon tote that was ordered in July. Therefore, in approximately 3 months' time Midwest Press has used 150 gallons (1026 lbs @ 6.84 lbs/gal), suggesting that on a monthly basis, the mineral spirits emissions were less than 1000 lbs. I will request, however, that Midwest start tracking on a monthly basis how many gallons of minerals spirits they use in order to demonstrate more clearly that mineral spirit usage is exempt per Rule 290.

**Midwest Press & Automation appears to be in compliance with Michigan's Air Pollution Control Rules at this time.**

NAME

Michelle Jones

DATE

10/26/16

SUPERVISOR

B. M.