

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

U83180002142924

FACILITY: Cadillac Fabrication		SRN / ID: U831800021
LOCATION: 1340 Marty Paul Street, Cadillac		DISTRICT: Cadillac
CITY: Cadillac		COUNTY: WEXFORD
CONTACT: Rusty McKellar , General Manager		ACTIVITY DATE: 11/29/2017
STAFF: Kurt Childs	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Compliance Inspection.		
RESOLVED COMPLAINTS: C-18-00550		

I conducted an inspection of Cadillac Fabrication Inc. on November 29, 2017 to determine compliance with the Michigan Air Pollution Control rules and to investigate an anonymous complaint referred to the Air Quality Division (AQD) from US EPA. Cadillac Fabrication Inc. is a custom metal fabrication shop for industrial equipment such as semi-trailers (for hauling boats on trailers), loading ramps, bridges, ladders, platforms, mezzanines, material handling products, structural steel tanks and vessels. The AQD received an anonymous complaint referral from US EPA indicating only that, Cadillac Fabrication Inc. was spraying paint on the ground behind the building.

Prior to the inspection I observed the plant from offsite and noted several dust collectors that all vented back into the plant. There is also one stack on the south end of the building. At that time, I did not notice any odors or see any visible emissions from the facility. The plant is surrounded by a paved parking lot and adjacent to a dirt yard area where equipment was stored. Entering the plant, I did not observe any areas that appeared to have paint on the ground.

At the plant I met with Mr. Rusty McKellar the General Manager for Cadillac Fabrication. I presented my credentials and informed him of the purpose of my inspection including the complaint referral. Mr. McKellar was willing to show me the plant and we began looking outside at the parking lot and plant yard. Neither the paved areas or dirt areas showed any sign of paint or other liquids on the ground. The parking lots and yard were orderly and neat with finished products, spare parts and materials in storage.

Inside the plant, Mr. McKellar explained the plant operations to me. The plant is set up with three parallel production bays. Materials are brought in the North end of the plant and production proceeds southward down each of the bays. Different products are produced in each bay. The first bay (west side) was being used to produce trailers, the second bay was being used for custom job shop work, the third bay (east side) was being used to produce steel bridges that are used by the forest service and MDNR. Due to workload it was also handling overflow trailer production.

Production activities for each of the bays includes metalworking activities such as cutting, bending, grinding, to produce parts for the products. Each bay also contains a welding station that is used to assemble the parts. The south end of the building contains a large abrasive blasting booth and paint booth. The paint booth is large enough to contain two of the large trailers. At the time of the inspection there were some small parts and one trailer curing inside the booth which is heated. A paint storage area is located next to the paint booth. There were many one gallon and five-gallon containers of coating and one 55-gallon drum. This area is also used for waste paint collection. Cadillac Fabrication has a solvent reclamation process to reclaim used thinner.

The Cadillac Fabrication building is equipped with four cartridge filter style dust collectors that filter general in-plant air from four exhaust ventilation systems located within the building. The exhaust from each of the collectors is routed back into the building. There was no visible dust or smoke within the building.

The sand blasting booth has its own dust collection control that also vents back into the building. The paint booth is equipped with filters that were in good condition and an exhaust stack that exits the south side of the building in a vertical direction at roof height. It is also equipped with a rain cap.

It appears many of the processes at Cadillac Fabrication may qualify for exemptions from Rule 201 requirements for a permit to install. I informed Mr. McKellar of this and offered to provide additional

information regarding the exemptions so that Cadillac Fabrication could make this determination. The processes and exemptions include:

- Various Metalworking activities, Rule 285(l)(vi)
- Sand Blasting, Rule 285(l)(vi)
- Welding, Rule 285(i)

Cadillac Fabrication was not maintaining specific records of coating usage so additional information was necessary to determine the status of the paint booth. At the time of the inspection SDS's were available for each of the coatings and copies were provided as was a general estimate of weekly coating usage for several of the higher usage coatings. I also requested coating purchase records for the past year which Mr. McKellar said they could provide within the next week. The SDS's contain some information on the contents of each coating but not the density. Several of the coatings contain HAPs so major source HAP thresholds (10 tons for individual HAPs and 25 tons for all HAPs combined) are relevant.

Based on the SDS's provided, coatings and HAPs are as follows:

HAP	Thinner 25	Urethane Converter 8800	Urethane Converter 8843	Carbothane 8812 Part A	Carbothane 8845 Part A	Gray Primer	Polane Exterior Catalyst
Xylene	50%			10%		1.43%	
Ethyl Benzene	25%			5%	1%	0.21%	
Hexamethylene 1,6-Diisocyanate (MSDS Identifies the component as Hexamethylene Diisocyanate)		1%	1%				89.83% (Hexamethylene Diisocyanate Polymer)
Cumene						0.54%	0.3%

Due to the use of coatings containing HAPs, Cadillac Fabrication may be subject to regulation under the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations for Paint Stripping and Miscellaneous Surface Coating, Title 40, Part 63, Subpart HHHHHH; or Area Source Standards for Nine Metal Fabrication and Finishing Source Categories – 40 CFR Part 63, Subpart XXXXXX; or Surface Coating of Miscellaneous Metal Parts and Products – 40 CFR Part 63, Subpart MMMM. I informed Mr. McKellar of this and offered to provide additional information. The State of Michigan does not have delegation for these Federal regulations so additional evaluation of compliance was not conducted.

Following the inspection, I sent Mr. McKellar an email with additional information regarding; Rule 201 exemptions, coating usage and emission calculations, permit to install application, and NESHAPs as well as contact information for the Environmental Assistance Program.

On December 6, 2017 I received an email response that indicated 1,286 gallons of paint and 268 gallons of thinner were purchased in 2017. The same day, I requested additional information regarding the specific materials purchased. On December 18, 2017 I received an email stating that the requested records would be provided ASAP.

Additional information consisting of purchase invoices for Sherwin-Williams and Carboline coating products was received on January 4, 2017. These records indicate that coating purchases during several months exceeded 200 gallons (see attached records and spreadsheet). This indicates the coating usage may have exceeded 200 gallons per month. However, it is possible that coating usage is less than 200 gallons per month and the coating line may qualify for an exemption from the Rule 201 requirement for a Permit to Install pursuant to Rule 287. However, Cadillac Fabrication has not maintained the necessary records to demonstrate compliance with Rule 287. Additionally, VOC and HAP emissions may have exceeded Rule 290 and Rule 291 thresholds. Records are not available to demonstrate compliance with these exemption rules either. As a result, it appears Cadillac Fabrication has been operating a coating line without a Permit to Install in violation of Rule 201 and should immediately apply for a Permit to Install for the coating operation.

A Violation Notice will be sent citing the Rule 201 violation.

NAME 

DATE 1/8/17

SUPERVISOR 