DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection

B753025742	,	
FACILITY: Acument Global Technologies - Fenton Processing		SRN / ID: B7530
LOCATION: 2480 OWEN RD, FENTON Screw		DISTRICT: Lansing
CITY: FENTON		COUNTY: GENESEE
CONTACT: Brian Clifford ,		ACTIVITY DATE: 06/25/2014
STAFF: Brad Myott	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Perform inspection to d	etermine compliance with PTI 143-97 and general PT	1 70-11.
RESOLVED COMPLAINTS:		

Facility Contact: Brian Clifford; bclifford@acument.com

On 6/25/2014 at approx. 1:30 p.m. I performed a scheduled inspection of Acument Global Tech - Fenton Processing located in a commercial/light industrial area off of Owen Road, in Fenton. Ambient temps were approximately 80 degrees F, with sunny skies. I did not notice any visible emissions or odors outside the facility. I entered the site and met with Mr. Brian Clifford. Gary Killian was not in at the time. Mr. Clifford has since replaced Mr. Killian as the environmental contact for this site. This was an unannounced inspection. I explained to Brian that I was there to perform an inspection of his facility and a copy of the "Environmental Inspections" brochure was provided to him.

The facility processes metal fasteners and washers for the automotive industry. Manufactured parts are shipped to the company where they are processed to meet customer specifications. This is not a manufacturing facility as that is done at their other locations. This is considered a processing facility as the parts are heat treated in one of the two heat treat lines and/or plated or coated to customer specs. Each heat treat line is covered by the same permit. The furnaces operate using natural gas.

The following is a list of emission units at the facility:

Emission Unit	Description	permit/exemption	compliance
EU- HeatTreat1	2-part Heat Treatment line including natural gas-fired hardening furnace and draw furnace, and quench oil bath. Identified as 566 line.	143-97	yes
EU- Heattreat2	2-part Heat Treatment line including natural gas-fired hardening furnace and draw furnace, and quench oil bath. identified as 834 line.	143-97	yes
EU- PrecoteLine	Metal parts flow coating lline(s) covered by general permit.	70-11	yes
EU- PlatingLine	Zinc electrolytic plating line	285(r)	yes
EU-Boiler	0.85 MMBTU/hr Bryant Boiler	282(b)	yes

Mr. Clifford showed me around the facility and explained the different emission units to me. The 2-part heat treatment process begins with a pre-wash hot water bath prior to the part entering the hardening furnace where parts are subjected to a temperature of approx. 1650 degrees F. Parts are then quenched in an oil bath and rinsed in a water wash station. The metal parts then enter a second heat treating furnace (draw furnace) that is heated to approx. 850 degrees F. Emissions from each part of the process are collected and emitted to atmosphere.

Brian, Jeff Scott (heat treat operator) and myself went outside the facility to view the stacks from the heat treatment lines. The heat treat lines were operating at the time. Jeff Scott and Brian Kelly conduct visible emission readings at least once per month on four different stacks (prewash and postwash stacks for each line), see attached VE forms for May, 2014 from Acument. No visible emissions were

noted from any of the stacks on this day. The permit allows a six-minute average of 20% opacity per special condition 13.

The quench oil liquid level is monitored and refilled as necessary from a oil storage tank. Records of oil removed and oil added to the quench tanks each month are maintained on site. Mr. Clifford provided me with a copy of their oil usage rates, see attached. The permit does not specify an oil usage limit, only that records of usage be maintained. The 12-month rolling total of oil loss through May 2014 was 7,805 gallons for both lines combined.

We then returned inside the plant and Mr. Clifford showed me the flow coating lines (PreCote Line) covered by general permit 70-11 and the exempt zinc plating line. Parts are coated or plated according to customer specs. The finished parts are collected in bins and shipped to customers.

Mr. Killian and Mr. Harris later emailed me a copy of their VOC usage records and calculations required by PTI 70-11 for the small flow coating lines. see attached. The total VOC emissions from the 2 coating lines were 3.15 TPY, well below the permit limit of 10 TPY per line, 30 tpy for the entire coating process.

No violations were noted during my inspection and the plant appeared to be in compliance with the conditions of permits 143-97 and 70-11. The plant was very clean and well maintained. Mr. Clifford was very helpful during the inspection.

NAME

SUPERVISOR DATE