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

B882426909

FACILITY: Eugene Welding Co.		**SRN / ID:** B8824
LOCATION: 302 Carleton St., MARYSVILLE		**DISTRICT:** Southeast Michigan
CITY: MARYSVILLE		**COUNTY:** SAINT CLAIR
CONTACT: Marshall D'Ambrosi , Operations Manager		**ACTIVITY DATE:** 08/26/2014
STAFF: Samuel Liveson	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Unannounced level 2 target inspection.		
RESOLVED COMPLAINTS:		

On August 26, 2014 Air Quality Division (AQD) staff Rem Pinga and I conducted an unannounced, self-initiated level 2 inspection of SpaceRAK, a division of Heartland Steel Products LLC doing business as Eugene Welding Company (Eugene Welding). Eugene Welding is located at 2420 Wills Street and 302 Carleton Street in Marysville, MI. The purpose of the inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the conditions of Permit to Install (PTI) No. 841-84C and PTI No. 169-10, and Consent Order AQD No. 9-2005.

We arrived on site around 12:15 pm at the 302 South Carleton Street entrance. We met with Mr. Marshall D'Ambrosi, Operations Manager, who provided records and a site walkthrough and explained equipment and operations. Mr. Patrick Hook, previous Chief Operating Officer, is no longer with the company. I provided Mr. D'Ambrosi with my contact information and a copy of the pamphlet "DEQ Environmental Inspections: Rights and Responsibilities."

Eugene Welding produces square and rectangular tubing and adjustable racks, as well as decking for the racks. These are used for the automotive industry and by large commercial stores, on which products are placed for sale. PTI No. 841-84C is for the coating line on site and its associated oven. Because PTI No. 169-10 is for a burnoff oven that was not installed within 18 months after the permit was issued, a request to void the permit will be made per Air Quality Rule 336.1201(4).

Site Walkthrough
Eugene Welding has two locations kiddy-corner from each other: at the 302 South Carleton Street address are buildings 18 through 21, which include the paint booth as well as the maintenance department. Around the corner at 2420 Wills Street are Building #24 and the machine shop.

302 South Carleton Street
Buildings #20 and 21 are a warehouse and a welding area. The welding area includes 7 welding booths; two that are beam welding and five that are acetylene welding. The acetylene is stored onsite nearby in pressurized tanks. This manual welding area appears to be exempt from permitting requirements via R 285(i).

Building #19 is the fabrication area. Raw material is brought in as steel sheets. The long rolls are cut into smaller pieces via fabrication equipment such as a mill, a mig welder, a saw, sheers, presses, a cutter, and a marvel saw. According to Mr. D'Ambrosi, a column mill was decommissioned in February of 2013. The fabrication equipment exhausts to the general in-plant environment, and appears exempt from permitting requirements per R 285(l)(vi)(B). The mig welder appears to be exempt from permitting requirements per R 285(i).

A small Zep parts washer in the fabrication area had been left open, and it did not have operating instructions. Rem and I asked Mr. D'Ambrosi and a worker in the fabrication area to keep the lid closed when the parts washer is not in operation, and we provided instructions to post on the parts washer. We used discretion to avoid issuing a violation notice. The parts washer appears to be exempt from permitting requirements via R 281(h).

We visited the building that houses the maintenance department and contains spare parts. This equipment does not appear to emit to ambient air. Mr. D'Ambrosi mentioned that a blower in this building may be hooked up to the paint line in the near future to help direct emissions through the paint line filters.

Building #18 has additional fabrication equipment such as a tube mill, a roll form mill, a hole punch, and a machine to mold steel into the correct shape for decking. Here, steel can be formed into decking, braces, column

stock, and beams. A small Zep cold cleaner in this building was closed and had instructions posted. The cold cleaner appears to be exempt from permitting requirements via R 281(h).

Building #23 has the coating line covered under PTI No. 841-84C. It was not in operation during our inspection. A grid of mesh filters was present at each of the two automatic spray paint areas and each of the two manual spray paint areas. The mesh filters appeared to be snug and tight along the grid, and filters appear to be operating properly; no fallout or odors were observed, and the area is well-kept, as required in PTI No. 841-84C Special Condition (SC) 1.6. Replacement mesh filters were present nearby. Filters are changed several times a day as needed, whenever there is a gap in the coating line that gives enough time to change the mesh filters.

Parts are hung on a moving rack traveling at approximately 12 feet a minute. They travel first through two automatic spray booths, then two manual spray booths, and finally a curing oven, all in series. According to Mr. D'Ambrosi, an electrostatic charge helps paint adhere to grounded parts hung on the moving rack.

As required by SC 1.4, waste materials are stored in a separate room in 55 gallon closed containers. Spent filters are wrapped in plastic to minimize the introduction of air contaminants to ambient air, as per SC 1.5. Waste is hauled offsite by MPC, and is not considered hazardous because no HAPs are present in any coatings.

The last stage of the coating line, the natural gas-fired cure oven, is covered under PTI No. 841-84C.

PTI No. 169-10 covers a burnoff oven that is located on-site and was bought 3-4 years ago, but was never installed. AQD staff observed that it is does not have an attached natural gas line or associated stack. I will request that the permit be voided since the permit was issued on August 24, 2010, and installation did not occur within 18 months, as required in R 201(4). Instead of using the burnoff oven, hooks are washed and rinsed with water or sent off site to be cleaned.

2420 Wills Street
2420 Wills Street is the other property owned by Eugene Welding under the same SRN B8824. This property contains Building #24 and the machine shop.

Building #24 has more fabrication equipment that emits into the in-plant environment and appears exempt from permitting requirements per R285(l)(vi)(B). Raw coiled steel is present in this building, along with a slitter to divide the steel into smaller sections, a square tube mill, two tube mills, and a woodsaw. The wood is used as bracing in between stacked steel pieces. Because the main press in the room, which puts holes into parts, is being repaired, parts are being punched in sister facilities and sent back to the Marysville location until the main press is fixed.

The machine shop houses about 15 various pieces of machining equipment including a CNC lathe, manual lathes, blancher grinders, mills, drill presses, and a Zep parts cleaner that was closed with operating instructions posted. The machining equipment and Zep parts washer appear to be exempt from permitting requirements via R 285(l)(vi)(B) and R 281(h) respectively. Lastly, a steam parts washer in the machine shop appears to be exempt from permitting requirements per R 281(e).

According to Mr. D'Ambrosi, no emergency generators or boilers other than for service water heating are present on site.

Recordkeeping
Mr. D'Ambrosi provided all records required in SC 1.8, 1.9, and 1.10 from January of 2013 through July of 2014. HAP records are not kept because according to Mr. D'Ambrosi, all coatings used by Eugene Welding are HAP-free. MSDS sheets provided by Mr. D'Ambrosi for the 7 most-used coatings at the site showed that the coatings did not have HAPs. Eugene Welding received permission from AQD to use formulation data in lieu of Method 24 to keep track of all coating VOC contents, water contents, and densities per SC 1.7.

Since April of 2013, the highest VOC emissions in tons per year (tpy) on a 12-month rolling time period were 43.61 tons in February of 2014; well below the permit limit of 81.6 tpy. Records from December of 2013 match 2013 emissions reported from MAERS. From January of 2014, no paint VOC contents exceed the permit limit of 3.0 lb/gal.

Compliance
Based on the AQD inspection and records review, it appears that Eugene Welding is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act,

1994 PA 451, as amended, the conditions of Permit to Install (PTI) No. 841-84C and PTI No. 169-10, and Consent Order AQD No. 9-2005.

NAME [signature] DATE 9/29/14 SUPERVISOR CJE