

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

G107533342

FACILITY: Aircraft Precision Products, Inc.		SRN / ID: G1075
LOCATION: 185 INDUSTRIAL PARKWAY, ITHACA		DISTRICT: Lansing
CITY: ITHACA		COUNTY: GRATIOT
CONTACT: Kevin Augustine, Plant Superintendent		ACTIVITY DATE: 02/04/2016
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, self-initiated inspection. Did an inspection to verify compliance with the installation of a water evaporator under Rule 290.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Kevin Augustine, Plant Superintendent (kaugustine@aircraftprecision.net)
Bill Henderson, President (bhenderson@aircraftprecision.net)
Jill Gross, Controller

Purpose: Conduct an unannounced, self-initiated compliance inspection. Aircraft recently voided their last remaining air permit, PTI No. 987-91, for a water evaporator. They removed the permitted water evaporator and installed a new one under Rule 290. Aircraft's consultant, Bill Hilton, contacted me in late 2015 (November or December) wondering if I could come out and verify that the unit was in fact exempt under Rule 290 per their recordkeeping. This inspection was in response to this request.

Facility Background/Regulatory Overview: Aircraft Precision Products is a minor source which fabricates and coats internal aircraft engine component parts. There are currently no active air permits for this site.

Inspection: This was an unannounced compliance inspection. At approximately 11:00 a.m. on February 4, 2016, I met with Kevin Augustine, Plant Superintendent, and Jill Gross, Controller. I explained to Kevin and Jill why I was there, and explained what I would be looking for. I gave J. Gross a DEQ "Environmental Inspections: Rights and Responsibilities" brochure to illustrate a typical inspection procedure, a July 2014 Permit to Install Exemption handbook, and a Boiler MACT outreach brochure to pass along to Bill Henderson, who later joined us during the inspection.

K. Augustine gave me a tour of the plant. Table 1 contains a list of the types of equipment and the exemptions they fall under.

Table 1. Installed Exempt Equipment

Equipment	Exemption	Compliance Determination
Grinding – 9 units	Rule 285(l)(vi)(B)	Compliance
Mills – 8 units	Rule 285(l)(vi)(B)	Compliance
Lathes - ~21 units with internally vented dust collectors	Rule 285(l)(vi)(B)	Compliance
Plasma thermal spray with dust collector	Rule 285(i)	Compliance
Wet blast machine – power wash sandblasting, vented to internal particulate control	Rule 281(c)	Compliance
Parts washer (cold cleaner).	Rule 281(h)	Compliance
2 ultrasonic power cleaners to clean parts	Rule 285(r)(iv)	Compliance
Samsco Corp SWE-11 500 series Water Evaporator	Rule 290	TBD at later date

Aircraft Precision has a 2' x 3' cold cleaner that K. Augustine said seldom gets used and will be removed. The air:vapor interface is less than the 10 ft² Rule 281(h) restriction and is therefore exempt from a permit to install. During the inspection I verified that the cold cleaner still contained solvent. And it appeared that some of the solvent was leaking out of the drum where the solvent is kept when not in use. I told K. Augustine and B. Henderson that this should be taken care of/cleaned up. Attached is the SDS of the mineral spirits (CAS 64742-47-8) used in the cold cleaner.

K. Augustine explained that the water evaporator is used to evaporate the water off of the spent coolant used in the lathes and the mills. The spent coolant is pumped out of the lathes and mills with equipment similar to a shop vac and transferred to the water evaporator. The coolant mixture is heated and the water vapor leaves the stack while the residual soap, oil, and coolant remains as a sludge which is shipped out as waste. K. Augustine said this equipment has not yet been operated for processing coolant, but has been tested using only water. Aircraft Precision already has a record sheet set up to record coolant usage, etc, for Rule 290. The record sheet includes the amount of coolant mix added to the evaporator, the hours the evaporator is run, the gallons of oil and sludge that is leftover (this includes oil that boils to the top). K. Augustine said that Aircraft Precision will request I visit them again, or send me the recordkeeping they've been doing to verify and ensure that they are correctly using exemption Rule 290 when they begin operating the water evaporator.

Aircraft Precision provided me with the SDS for the coolant they will be using (attached), TRIM MicroSol 6851f. Monoethanolamine makes up a maximum of 10% of the coolant and has an ITSL of 80 µg/m³, "severely hydrotreated petroleum oil," under CAS 64742-52-5 makes up 20-30% of the coolant and has an ITSL of 50 µg/m³. It is likely, therefore, that Rule 290(a)(ii)(A) would be the applicable conditional exemption, as long as Aircraft Precision keeps a description of the water evaporator (R 290(b)); records of the material use and calculations to identify the quality, nature, and quantity of the air contaminant emissions to demonstrate that Aircraft Precision can meet the 1000 lb/month limit (R 290(c)); and keep the records for a minimum of 2 years (R 290(c)).

Aircraft Precision Products is in compliance with state and federal regulations at this time.

NAME *Michelle Lipton*

DATE 2-12-16

SUPERVISOR *D. M.*