NA70500447

NO765 Page 1 of 3 Manda Mourse

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

NU76529117			
FACILITY: NATIONAL GALVANIZING HS PROCESSING LP		SRN / ID: N0765	
LOCATION: 1500 TELB ST, MONROE		DISTRICT: Jackson	
CITY: MONROE		COUNTY: MONROE	
CONTACT: Frank Belanger, Maintenance Manager		ACTIVITY DATE: 04/09/2015	
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS:	
SUBJECT: Complete scheduled insp	pection. Minor Source permit metal treatment line	e. Clean and Galvanize steel coils.	
RESOLVED COMPLAINTS:			

Inspection date: 4/9/2015

Contacts: Frank Belanger, Maintenance Manager, frank.belanger@nationalgalvanizing.com

Rebecca Riley, PHR, Human Resources Manager, becky.riley@nationalgalvanizing.com

SRN: N0765, Monroe County

On April 9, 2015, the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced complete scheduled compliance inspection at the National Galvanizing L.P. (hereinafter NG) located at 1500 Telb Road, Monroe. The purpose of the inspection is to determine the facility's compliance status with applicable federal and state regulations, in particular Part 55, Michigan Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules and the conditions of NG's Air Use Permit to Install (PTI) No.65-89.

This facility is a pickling, galvanizing and splitting operation. They bring in rolls of steel, pickle it in a hydrochloric acid bath to clean it up and then they galvanize the steel. The coils are then cut to any width requested by their customers. The pickling process is covered by PTI 65-89 and includes a hot acid bath, a multi-sieve-tray type scrubber with a mist eliminator section in the stack, and a steam generator (a dual fuel capable boiler, only natural gas fuel is used). The galvanizing process does not have a permit and was apparently originally permitted (@1984) but was later determined to be exempt.

During the inspection I asked if NG has an emergency generator and Mr. Belanger said they bought an old Waukesha Serial No. F2895GSI and installed it approximately in September, 1998. Mr. Belanger said it was converted to natural gas (was likely originally diesel). I informed NG about the Act 451, Rule 201 requirement to obtain a permit unless the process/equipment meets the exemption size of less than 10 MMBTU/hr maximum heat input. I also briefly explained that there are also Federal regulations that may apply, 40 CFR 60, New Source Performance Standards (NSPS) and/or National Emission Standards for Hazardous Air Pollutants (or Maximum Achievable Control Technology) for Reciprocating Internal Combustion Engines (RICE) Subpart ZZZZ. I told them that specific information is required about the emergency generator and when they purchased/installed it and I will be able to assist them in determining the applicable requirements. I also explained they will at a minimum need to conduct regular maintenance on the engine and track hours it operates.

INSPECTION

Upon my arrival I introduced myself to the receptionist, signed in and provided my identification and stated the purpose of my visit. AQD's last inspection was conducted on May 5, 2011. Prior contact listed in AQD's NG plant file is Mike Miller, Quality Manager, who I was told was not there today. I met with Rebecca Riley, Human Resources Mgr., Frank Belanger, Maintenance Mgr. and Mrs. Riley's son Brandon, who also works for NG.

I reviewed the purpose of the inspection, the facility permit, and had a general preinspection conference. Mr. Belanger explained the process. Mr. Belanger, Mrs. Riley and her son all accompanied me during the physical plant inspection of their operations. I was informed that NG operates 3 shifts / 5 days per week and employs approximately 100 people. NG has been operating at this location approximately 29 years. I gave Mrs. Riley a copy of the DEQ Brochure, Environmental Inspections: Rights and Responsibilities, and a copy of the Permit to Install Exemption Handbook for reference.

During the walk through inspection of the facility I observed both the galvanizing and pickling lines were operational. I observed that coiled steel is passed through several HCI acid baths which are all ducted to the large scrubber. This process cleans rust, dirt and oil prior to Galvanizing. They pass through hot water washes and dryer section as well. The final stage applies an oil depending on whether the steel coil will be galvanized or not. I requested MSDS for the materials used here. Per Mr. Belanger the oil coat is specified by the customer. I observed several material storage totes near the end of the line.

I am aware that there is a Steel Coil coating federal NSPS and I advised NG that I will review if there are any applicable requirements for the coating station. Prior inspection report 1999 indicates this was part of the process and the coating was a mineral oil. It appears that it is not subject to the NSPS.

On the pickling line I observed that the Heil Series 740 Sieve Tray Scrubber was operational. We discussed their maintenance operations for the scrubber. Weekly they check the static pressure of the scrubber. Monthly they check the scrubber motor load readings. Then quarterly they power wash scrubber grids and inspect the scrubber plates and filters. The plates that are plugged are cleaned, repaired or replaced as needed.

I observed the digital flow gauge on the Scrubber read: 2.5 gpm. The Manometer read 8 inches of water column. Per Mr. Belanger they keep it at approximately 8 inches and if it falls below they know they need to clean the sieve plates.

PERMIT

Number 65-89

Special Conditions

14. The hydrochloric acid (HCL) emission from the pickling process shall not exceed **5.1 milligram per cubic** meter, corrected to **70° F and 29.92 inches Hg**.

Finding - Compliant. NG said that they conduct periodic formal testing and once per month they pull samples themselves using a Draeger Tube as an ongoing compliance check of the HCI ppm. I requested the documentation of the last more comprehensive test done and also their records of monthly testing. On April 17, 2015 I received the requested records and they indicate compliance (attached to this report).

15. There shall be no visible emissions from the pickling process. Finding – Compliant. There was no visible emission or acid odor observed from the scrubber during my inspection.

16. The AQD can require a test to verify the hydrochloric emissions from the pickling process. Finding – There are no reasons to require a test at this time. AQD's 2002 inspection report says the results of the last stack test found an average HCl concentration 0.97 ppm (equal to 1.5 mg per dry standard cubic meter); and an emission rate of 0.022 pounds per hour, which equates to 192.72 pounds HCl per year.

Compliant: A copy of NG's last Test Results report was received by email 4-16-15. The HCl results show an average emission rate of 0.30 ppm (0.5 mg/dscm@70degF) and 0.007 lb/hr. This is less than the permit emission limit.

17. Applicant shall not operate the pickling process unless the scrubber is installed and operating properly.

Finding – Compliant. The scrubber and mist eliminator undergo regular maintenance. Records were requested and were sent to me following the inspection. All documents are attached to this report. I observed that the scrubber was installed, operating and appeared to be operating properly.

 18. The exhaust gases from the pickling process shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 72 inches at an exit point not less than 90 feet above ground level.

Finding – Compliant. The stack was installed several years ago and has not been changed. It is very tall and I observed the stack has test port holes and an obvious section that is said to hold the mist eliminator. I did not conduct a roof inspection at this time.

Mr. Belanger and Mrs. Riley stated that Mr. Miller maintains all records electronically and it would be best if he forwarded these to me. I provided a list of what was required based on the permit and my observations during the inspection. The agreed upon date for submittal is Friday, April 17.

During the inspection I observed the Pickling Process Line steam Boiler that uses only natural gas; the original permit application indicates it as natural gas fired. The Seriel no. RU14979 and Model No. F-2895-GSIU 480 V. The boiler plate states it is 8.4 input MMBTU/hr. The PTI 65-89 has no emission limits for the boiler. It appears it is not subject to the federal NSPS Subpart Dc due to it's size and possibly the installation date. I gave Mr. Belanger a DEQ Fact Sheet for this federal standard. It also appears to not be subject to the newer Area Source Boiler MACT standard Subpart JJJJJJ because it uses natural gas only.

I observed the emergency generator. It was not operational and appeared to be an older model.

COMPLIANCE SUMMARY

On 4-16-15 NG submitted by email their Work Orders for the Boiler and Scrubber, MSDSs for oil, caustic and rust preventative; and the Scrubber test results from March 2013. On 4-17-15 NG submitted the Work Orders for the Draegger tube HCI testing and provided additional information for the Emergency Generator.

The AQD determined that National Galvanizing is in substantial compliance with the applicable federal and state regulations and their PTI 65-89 at this time.

DATE SUPERVISOR