

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

N124834989

FACILITY: MAGLINE INC		SRN / ID: N1248
LOCATION: 1205 W CEDAR ST, STANDISH		DISTRICT: Saginaw Bay
CITY: STANDISH		COUNTY: ARENAC
CONTACT:		ACTIVITY DATE: 04/06/2016
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled inspection for minor source operating under permit exemption		
RESOLVED COMPLAINTS:		

On April 6, 2016, AQD District Staff conducted a scheduled site inspection at Magline Inc. located at 1205 West Cedar Street, Standish, MI 48658 (N1248). The purpose of the inspection was to confirm that the facility was still operating in compliance with local and federal regulations. Mr. James Gage, Plant Manager provided a tour of the facility and answered questions regarding operations and records.

#### FACILITY DESCRIPTION

The Facility is two interconnected buildings located at the SW corner of the intersection of Airport and W. Cedar (AKA W M-61). The Facility is located in a mixed commercial/industrial area on the west side of Standish, Arenac County, Michigan. St. Mary's of Michigan-Standish Hospital is located approximately 1,000 feet to the east of the facility, and is bordered to the south by the Standish Industrial Airport.

The facility at the time of the inspection was reported to assemble/fabricate mainly aluminum handcarts and ramps for the beverage distribution market. Most of the component parts are reported to be shipped in. Portions of the facility toured included the assembly, spot and tag welding, shipping, stock cutting, material staging and paint booth areas.

Vac collection systems were visible at appropriate work stations. Metal shavings were collected in appropriate bins and were reported to be recycled offsite. Visible drums or other storage containers appeared to be appropriately labeled, and properly stored. The areas were kept clean from spills.

#### COMPLIANCE HISTORY

The facility had previously been operated under Permit to Install 423-87. Per the January 22, 2009, site inspection report, the permit had been voided and the facility was operating their previously permitted paint booths under a Rule 290 exemption. The Magline Safety Manager and Plant Supervisor at the time of the 2009 inspection are no longer with the facility.

Evaluation of the material use at the time of the January 22, 2009 inspection (38 gallons for 2008) indicated that the booth may also have been exempt under Rule 287(c) for a surface coating line if all of the following conditions are met: (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month. (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system. And (iii) monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

The facility is not required to submit annual emissions reports in the MAERS. No complaints are of record for the facility since the last site inspection (January 22, 2009).

#### COMPLIANCE EVALUATION

At the time of the April 6, 2016, site inspection, the paint booth was not in operation and was reported to be used only occasionally. A review of appropriate records indicated that the facility is operating as required under Rule 287(c). Records for the most recent two year period indicated that the total volumes of coating (with water ) reported for 2014 and 2015 were 215 gallons and 365 gallons, respectively. Adjusting for water comment, these totals would be below the monthly maximum for an exemption.

The facility manager reported that the facility was evaluating removal of the booth and replacement with a powder coating line. A review of Rule 287, Permit to Install exemptions: surface coating equipment. Indicated that a number of potential surface coating options were available that would be exempt from

permitting and included a powder coating booth that has an appropriately designed and operated particulate control system and associated ovens (Rule 287(d)).

Based on the limited amount of coating activities conducted at the subject site, the facility may be subject to the following area source regulation: 40 CFR Part 63, Subpart HHHHHH (paint stripping and misc. surface coatings) based on the miscellaneous coating activities conducted onsite. An informational brochure prepared by EPA has been provided to the facility to allow them to evaluate the applicability to their facility. In addition, information regarding 40 CFR Part 63, Subpart XXXXXX for nine metal fabrication and finishing source categories has been provided to the facility. As determination for this subpart is determined by SIC/NAICS, the facility should be able to make a determination of applicability. MDEQ AQD at this time has not been delegated authority for the two referenced area sources.

#### SUMMARY

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NAME Sharon Webster DATE 6/16/16 SUPERVISOR C. Gage