

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N124861073

FACILITY: MAGLINE INC		SRN / ID: N1248
LOCATION: 1205 W CEDAR ST, STANDISH		DISTRICT: Bay City
CITY: STANDISH		COUNTY: ARENAC
CONTACT: Ken Groh , Production Manager		ACTIVITY DATE: 12/07/2021
STAFF: Nathanael Gentle	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Onsite Inspection. FY2022		
RESOLVED COMPLAINTS:		

On December 7, 2021, AQD staff conducted a scheduled onsite inspection at Magline Inc. Staff arrived onsite at 9:15 AM and departed at 10:20 AM. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment Great Lakes and Energy, Air Quality Division (AQD) Administrative Rules; and to ensure no processes at the facility require a Permit to Install (PTI) be obtained. AQD staff were assisted by Magline personnel, Mr. Ken Groh, Production Manager, and Ms. Alicia Fonzi, HR Director.

Facility Description and History

The Magline facility is located at 1205 W Cedar St, Standish, MI 48658. The facility is located in a mixed commercial/industrial area in Arenac County and is located 0.25 miles west of Ascension Standish Hospital. One stack, for a paint booth, was observed to be associated with the facility. No odors or visible emissions were detected. Magline Inc designs and manufactures hand trucks, as well as various equipment for the material handling industry. Examples of processes observed to be conducted onsite include, product assembly, material cutting and shaping, welding, painting in a coating booth, and product research and development.

Magline Inc had previously operated under Permit to Install 423-87. As described in the January 22, 2009, inspection report, the permit had been voided and the facility was operating their previously permitted paint booths under R290 exemption. The 2009 inspection report indicated the facility may meet the requirements of R287(2)(c). Magline Inc was last inspected on April 6, 2016. At the time of the 2016 inspection, the facility was found to be in compliance and able to operate without the need for a PTI by operating under PTI exemptions. Evaluation of material usage records in 2016 demonstrated the facility used 215 gallons of coating (with water) in 2014 and 365 gallons of coating (with water) in 2015. Adjusting for water content, these totals were determined to be below the monthly maximum to meet exemption R287(2)(c).

No complaints are on record for the facility since the last inspection on April 6, 2016. The facility is not required to submit annual emissions reports in MAERS.

Compliance Evaluation

A variety of fabrication processes were observed while onsite including equipment used to cut and shape metal. Examples of some equipment observed include mills, lathes, metal cutting equipment and metal bending equipment. The equipment was vented to the in-plant

environment and appears to meet the requirements of R285(2)(l)(vi). A variety of welding equipment was observed. Welding equipment is exempt from permitting based on R285(2)(i).

A section of the Magline facility is dedicated to research and development. In the research and development area, products are tested and developed. No equipment with air emissions was observed in the research and development area. Other areas of the Magline facility that did not include units with air emissions include product assembly, product staging and shipping, and inventory storage.

The Magline facility has one paint booth onsite. The paint booth, which replaced previous paint booths at the facility, was installed and came into operation on November 30, 2020. The exhaust system associated with the paint booth serves only the coating spray equipment. In addition, the booth is equipped with dry filter controls. The filters on the booth are changed regularly to ensure they are working properly. The booth exhaust system is equipped with a pressure gauge, measured in inches of water. Onsite staff monitor this pressure to determine when filters should be changed. Paint used at the facility is primarily water based, with the exception of one polyurethane-based product that is used on a select number of parts produced at the facility. Facility staff do not need to prep the metal before painting, except for occasionally wiping down spots with mineral spirits. No solvent mixing is required with the water-based paint. Staff are able to connect the spray gun directly to the paint cans and begin spraying. A separate spray gun is used for the polyurethane-based product. The polyurethane-based paint used at the facility comes in two 55-gallon drums. The spray gun is hooked up to both drums and the material is mixed in the spray gun.

Records of paint usage were provided in the form of purchase records for the last 12 months, as well as the most recent purchase of the polyurethane paint. On 8/31/2018, the facility purchased 220 gallons of the polyurethane-based paint. Due to the limited number of products that are coated with the polyurethane-based paint, facility personnel report this product is used infrequently. Staff estimate the product is sprayed for approximately 2 hours every 4 to 6 weeks. The facility is still using the polyurethane paint that was purchased in 2018. Of the 220 gallons that was purchased, facility staff estimate approximately 80 gallons still remains.

Products that are coated in the facilities paint booth are primarily coated with water-based paint. Staff report the shelf life of the water-based paint is only a few months. The water-based paint is purchased as needed and in smaller quantities to ensure the products don't exceed their shelf life. Purchase records of water-based paint were provided for the last 12 months and reviewed. From December 2020 to the date of inspection, the facility purchased a total of 440 gallons of the water-based paint. The most paint purchased in a single month was July 2021 with 65 gallons of paint purchased. The least amount of paint purchased in a single month was October 2021 with 5 gallons of paint purchased. During the 12-month period of records reviewed, an average of 37 gallons of paint was purchased per month.

Based on the records reviewed and discussions with facility staff, the facility appears to meet the requirements of exemption R287(2)(c). The coating rate of the facility appears to be below 200 gallons of month, including water. Being the facility primarily uses water-based paint, adjusting for water content the facility appears to be below the monthly maximum to meet the exemption. A copy of EQP 3562, Rule 287(2)(c) Permit to Install Exemption Record: Surface Coating Equipment, was provided to the facility. Facility staff said moving forward they would track paint

usage at the paint booth to ensure they have documentation to meet the requirements of R287 (2)(c). EGLE AQD will check back with the facility in a couple months to ensure paint usage is being tracked properly to demonstrate compliance with R 287 (2)(c).

As a facility that conducts surface coating operations, the Magline facility may be subject to the area source regulation, 40 CFR Part 63, Subpart HHHHHH. In addition, as a facility that conducts metal fabrication and finishing, the facility may also be subject to 40 CFR Part 63, Subpart XXXXXX. The potential of being subject to federal regulations was mentioned to facility personnel while onsite. Following the onsite inspection, links to information regarding both regulations were provided to the facility to aid them in determining subjectivity.

Summary

A scheduled, onsite inspection was conducted on December 7, 2021, at Magline Inc, located at 1205 W Cedar St, Standish, MI 48658. Magline Inc designs and manufactures hand trucks, as well as various equipment for the material handling industry. The purpose of the inspection was to confirm that the facility was still operating in compliance with state and federal regulations. Mr. Ken Groh, Production Manager, and Ms. Alicia Fonzi, HR Director, provided a tour of the facility, answered questions, and provided records. Current processes conducted at the facility appear to meet the requirements of one or more PTI exemptions. At this time, the facility appears to be in compliance.



NAME

DATE 12/15/2021



SUPERVISOR _____