

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

N195060884

FACILITY: SAGINAW CONTROL & ENGINEERING, INC.		SRN / ID: N1950
LOCATION: 95 MIDLAND RD, SAGINAW		DISTRICT: Bay City
CITY: SAGINAW		COUNTY: SAGINAW
CONTACT: Rob Young, Plant Quality Control Manager and Safety Officer		ACTIVITY DATE: 11/09/2021
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Facility Inspection		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (AQD) conducted an inspection of Saginaw Control and Engineering (SCE). The facility makes and coats metal electrical junction box enclosures as well as enclosures for other uses. The typical company contact in the past was Ron Zeitler. Instead of Ron, I met with Rob Young. Rob is the Plant Quality Control Manager and also Plant Safety Officer. The facility was previously covered by permit to install 29-97A. It concerned coating equipment and also contained "opt-out" provisions to keep the company out of the renewable operating permit program. Based on the planned operational / production changes and new construction ongoing at the time, the company requested the permit be voided. AQD had shared permit exemptions and the company felt comfortable using the exemptions and voiding the permit. The permit was subsequently voided on October 15, 2015.

Since Rob was relatively new to dealing with AQD issues I provided an overview of AQD regulations, past permitting actions, and lastly exemptions. Rob asked pertinent questions about AQD regulations and a good exchange of information occurred. Rob confirmed the expansion and change in operations that were commencing on my previous visit had come to fruition. I inquired about the new Saginaw County facility SCE built northwest of the intersection of M-46 and Graham Rd. Rob offered a tour of the facility after finishing business at the Midland Rd facility.

Going into the facility it was instantly obvious there had been a focus to improve operations. Also, the new construction was completed on the north end of the plant. Operations had been moved about to better consolidate production activities. Some new robotic equipment had also been installed. Spray application of coatings is no longer occurring and all of the equipment had been removed. SCE still uses an aqueous washer system prior to coating enclosures in the powder coating system. The washer has seven stages. The first two stages are spray cleaners (Bulk kleen 842HP), followed by two water rinses. The fifth stage is a rust inhibitor (Zirca Sil 18 l). The sixth stage is a reverse osmosis water rinse and the last stage is a sealer (E-CLPS 1700). No acids are used in the washer system. The seven stage washer system appears to meet exemption 285 (I)(iii). The exemption reads (I) The following equipment and any exhaust system or collector exclusively serving the equipment: (iii) Equipment for surface preparation of metals by use of aqueous solutions, except for acid solutions.

The various equipment used to cut and form enclosure boxes is mostly internally exhausted. Only a few pieces are externally exhausted. The equipment appears to meet exemption 285 (I)(i) and 285 (I) (vi) (B) and (C). The exemption reads (I) The following equipment and any exhaust system or collector exclusively serving the equipment: (i) Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals, and (vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following: (B) Equipment that has emissions that are released only into the general in-plant environment. (C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

The powder coating operation appears to meet exemption 287(d). The exemption reads (d) A powder coating booth and associated ovens, where the booth is equipped with fabric filter control. The fabric filter control shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the owner or operator shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

The facility maintenance area had a parts washer which used Super Clean in it. The temperature of the unit was 100 degrees Fahrenheit. Material information was checked and it was found to contain no volatile organic compounds (VOCs), It appeared to be a base type cleaner due to the high pH of the material. The parts washer appears to meet exemption 281(k). The exemption reads (k) Aqueous based parts washers. There is a specific definition for the exemption and it is found under Rule 101(q) which states (q) "Aqueous based parts washer" means a tank containing liquid with a volatile organic compound content of less than 5 %, by weight, and at a temperature below its boiling point that is used to spray, brush, flush, or immerse metallic and/or plastic objects for the purpose of cleaning or degreasing. Rob was also informed of the requirements under the part 7 rules for cold cleaners. The unit had operating instructions and the lid was closed as it was not in use at the time.

A small separate area is used as a R & D test lab and product quality demonstrations. The exemptions found under rule 283 for testing and inspection equipment appeared applicable to the lab.

Lastly, the site has some very small, natural gas fired back up emergency generators. One was a Cummins 50 KW unit installed 9-1-17 while the other was a 22 KW Generac unit installed 7-15-11. The engines appear to meet exemption 285(g). The exemption reads (g) Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input.

We discussed the federal regulations pertaining to federal regulations for the engines. Specifically New Source Performance Standards (NSPS) for spark ignition engines may be applicable to SCE. A link to 40 CFR Part 60 Subpart JJJJ was provided to Rob.

In addition to link for the NSPS, a link to the permit to install exemption handbook was provided in a followup email. The email also provided snips of the exemptions presented above.

The facility is deemed to be in compliance.

NAME B. Zuthoff DATE 12-7-21 SUPERVISOR Chris Hare