

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

N214745354

FACILITY: KERKAU MFG		SRN / ID: N2147
LOCATION: 910 TRUMAN PKY, BAY CITY		DISTRICT: Saginaw Bay
CITY: BAY CITY		COUNTY: BAY
CONTACT: Bryan Schindler, Plant Manager		ACTIVITY DATE: 07/17/2018
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of PTI 137-96A. New PTI to resolve VN of VOC exceedances, includes HAPs opt-out limits.		
RESOLVED COMPLAINTS:		

FI (glm) performed a self-initiated inspection of Kerkau Manufacturing on July 17, 2018. Mr. Matthew Karl, MDEQ-AQD and I met with Mr. Bryan Schindler, Plant Manager. The purpose of the visit was to determine compliance with PTI 137-96A. The permit was issued to correct VOC exceedances with the previous permit. The coating line has a metallic surface coating line. PTI 137-96 allowed the facility to operate under Rule621(10), which exempted the facility to the coating content limits in Rule621(1)(b). The facility exceeded the 10.0 ton per year (tpy) VOC limit, they now must meet the coating content limits in R621(b), which are three and one-half pounds of volatile organic compounds emitted per gallon of coating, minus water, as applied for air-dried coatings. The facility reformulated coatings with their supplier, Sherwin Williams, to comply with this condition. At the time of the inspection Kerkau Manufacturing was in compliance with PTI 137-96A and applicable federal and state regulations.

Description

According to the company's website, the facility was established in 1951 and purchased by the Baldauf family in 1983. At the time, the business consisted of a 125, 000 sq. ft. production facility and 125 employees. During the early years, Kerkau was primarily a production machine shop, doing high volume jobs for the automotive and petrochemical industries. Forgings and castings were supplied from the customer and the finish machining performed by Kerkau.

As Kerkau began to grow, the company started purchasing A105 carbon steel raw forgings and began machining, marketing and selling the highest quality pipe flanges in the market under the Kerkau name. In the early 90's, after expanding the A105 product line to include up to 42" NPS, Kerkau then added stainless 304/L and 316/L to the grades of material offered. With the Kerkau brand becoming more popular in the industry, in 2004, Kerkau began offering Long Weld Neck flange and was able to expand and build a 80,000 sq. ft sales office and finished goods warehouse on Mackinaw Road in the Valley Center Technology Park. In 2012, Kerkau again expanded the product line to include A350 LF2 low temperature carbon steel or the ford blue coating for projects in inclement weather such as Alaska.

The facility still manufacturers the same pieces and business fluctuates with the oil and gas market. They currently operate two shifts and run the coating line during only one shift, five days a week. There are currently 120 employees between all three locations.

PTI 137-96A: Compliant

The equipment covered in this permit is an automated coating line. The coating line utilizes a hanging conveyor system and consists of a hot water rinse, drying booth, and two electrostatic paint booths. The facility machines carbon steel raw forgings and machines into pipe flanges. The flanges are then washed in hot water to remove the cutting fluid and placed on racks that feed into the coating line. Two operators man the line, one on the ingress and one on the egress end. The operator on the egress end inspects the parts for proper coating and will touch up spots with a HPLV spray gun.

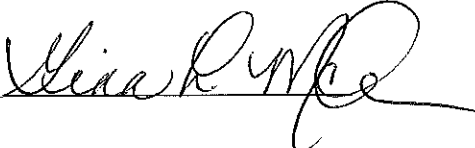
Mr. Joe Benson, egress coating line operator, changes filters on the line daily and sometimes more often depending on the days volume of parts. Sherwin Williams supplies the filters. We viewed the line in operation. It appeared that the spray line was over spraying the part to be coated by two feet or more. The process does not appear very efficient or effective. There is excess material being used and re-work from lack of properly coated parts by the automated sprayer. This may be an area the facility would want to focus on if they work on leaning their process.

I received records via email. EUCOATING has a 25.5 tpy VOC limit, based on a 12-month rolling time period as determined at the end of each calendar month. VOC emissions for the 12-month time period ending June 28th, 2018 were 3.36 tpy. the daily volume-weighted average to VOCs is limited to 3.5 lb/gal, which excludes the low-use coating VOC content. EUCOATING is in complying with these limits.

EUCOATING is limited to 1,000 lbs/year, based on a 12-month rolling time period as determined at the end of each calendar month. Acetone usage was 0.0 pounds for the 12-month time period ending June 28th, 2018.

FGFACILITY limits individual hazardous air pollutants (HAPs) to less than 8.9 tpy and aggregate HAPs to less than 22.4 tpy. For the 12-month time period ending June 28th, 2018, the facility was below the individual and aggregate limits. Styrene had the highest emissions at 0.002 tpy. Aggregate HAPs emissions for the same time period were 0.006 tpy. Blue paint usage, or low-use coatings material usage was 14.96 gallons of the 55 gallon limit.

At the time of the inspection the facility was in compliance with PTI 137-96A and the applicable state and federal regulations.

NAME  DATE 7/30/18 SUPERVISOR 