

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

N261144821

FACILITY: MEC - South Plant		SRN / ID: N2611
LOCATION: 8250 Mill Street, VANDERBILT		DISTRICT: Gaylord
CITY: VANDERBILT		COUNTY: OTSEGO
CONTACT: Brooke Sprenger , Human Resources		ACTIVITY DATE: 05/08/2018
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: scheduled site inspection of Former Van Products Facility. sgl		
RESOLVED COMPLAINTS:		

INTRODUCTION

On May 8, 2018, AQD District Staff arrived at MEC, an employee owned company, to conduct a self-initiated site inspection. MEC (formerly Van Products Company) located at 8276 Yuill Street (formerly identified as 8250 Mill Street and as 825 Mill Street), Vanderbilt, Michigan, 49795. (N2611) The referenced facility was in operation at the time of the site inspection. At the time of the inspection, no history was known for the facility.

A walk thru of the Facility was conducted with Ms. Brooke Sprenger, Human Resources Staff with MEC and housed at the MEC -North Plant located at 1444 Alexander Road, Vanderbilt, Michigan.

FACILITY

Otsego County Property Search records identified the facility as being located at 8276 Yuill Street, Vanderbilt, Michigan, and as owned by Center Manufacturing, Inc. of Mayville, Wisconsin. An internet search for MEC.com indicated that the full name is Mayville Engineering Company, Inc. The Facility is unfenced and un gated.

Further research in the District Files identified the facility as the former Van Products Company. This was confirmed by staff at H&H Tube located to the east of the Facility. District Files contained copies of activity reports for site visits conducted on August 14, 1979, March 29, 1990 and January 5, 2006. The business card for the Plant Manager at the time of 1990 site visit indicated that the company was "one of the largest producers of oil indicator assemblies and closures". Documentation for the 2006 site inspection, indicating that the Facility had originally opened in 1967, and was permitted under AQD permit no. 431-90 for 2 spot welders, 2 brazing tables, 1 mig welder and a degreaser utilizing chlorothene.

Adjacent properties include:

- H&H Tube (east),
- residential properties (southeast),
- commercial (south and southwest),
- Industrial/commercial (west)
 - o Former North Central Steel & Fabrication (N2923), and
 - o Vacant commercial/restaurant
- Industrial (north)
 - o Northern Timberlands Inc.

The Facility reports no changes in product produced onsite. Weather conditions at the time of the site visit were warm and sunny, with partially cloudy skies. No visible emissions (VEs) were noted at the time of the site visit.

PERMITTING

PERMIT NO.	EQUIPMENT	APPROVED	VOIDED
431-90	Welding and Brazing	8/23/1990	NA

The referenced permit was at the time of the site inspection still open. Permit conditions included limits to Visible Emissions (VEs) associated with each welding and brazing process (Special Condition (SC14)). In addition, the referenced permit included VOC emission rate limits (SC 15), monthly usage records (SC17) and operations in compliance with Rule 612 (SC 16) for the vapor degreaser associated with the permit. At the time of the 2006 site visit the degreaser was reported to have been replaced with one caustic/cleaner and one heated oil tank (phosphate/coating).

As a result of subsequent communications following the 2006 site inspection, Van Products Company submitted an Air Permit/Exemption Evaluation for the replacement cleaning tanks and heated oil coating tanks on February 15, 2006. No approval letter was found in District Files, which is consistent with the Division's policy of not approving Rule 201 exemptions, the burden of applicability being on the Facility. The exemptions identified in the 2006 correspondence are summarized later in this report, and include specific exemptions under Rules 284, 285 and 287. No verification of anticipated emissions were included in the 2006 exemption evaluation.

REGULATORY

The Facility is a true minor.

EQUIPMENT

At the time of the May 8, 2018, site inspection, the facility was operating. The site walk through was conducted with Ms. Brooke Sprenger. Additional operations information provided by Mr. Jim Tousley. The facility reports no changes in general process activities since the 2006 site inspection, only maintenance/repairs.

It should be noted that the exemptions to Rule 201 permitting were updated in December 2016, and the reference for the rule will have changed at that time. The following summaries identify process equipment identified during the May 8, 2018 site visit, or believed to be associated with the facility, as well as both the exemptions that may have been identified at the time of the previous reports, and the updated reference for the rule in *(Italics)*:

Rule 281 Cleaning, Washing and Drying Exemptions:

PROCESS/ACTIVITY	EXEMPTION
Aqueous Wash Systems – no volatile solvents used	R281(e) <i>(R281(2)(e))</i>

Rule 282 Furnaces, Ovens and Heater Exemptions:

PROCESS/ACTIVITY	ASSOCIATED EQUIPMENT	EXEMPTION
NG Boiler	Superior/Aztec/IGS 304 2,520,000 BTU/Hr	R282(b)(i)

Rule 284 Container Exemptions:

PROCESS/ACTIVITY	EXEMPTION
1200 gallon tank caustic & water mix	Rule 284
1200 gallon tank water & oil mix	Rule 284
3% Phosphoric Acid tank/trough	<i>R284 (2)(h)(ii)</i>

Rule 285 Misc. Exemptions:

PROCESS/ACTIVITY	ASSOCIATED EQUIPMENT	EXEMPTION
Brazing, soldering and welding activities	brazing, soldering, welding or plasma coating equipment	<i>R285(2)(i)</i>
Bending, forming, expanding, rolling, forging, pressing,	exhaust into the in-plant environment or outside with	<i>R 285 (2)(l)(i)</i>

drawing, stamping, spinning or extruding hot or cold metals.	appropriate pollution control device	
Metal Grinding		R285 (2)(l)(vi)(B)
Pipe Cutting	Cutting Equipment	R285 (2)(l)(vi)(B)
Cleaning Solution Tanks	Equipment used for preparation of metal surfaces using aqueous solutions, does not include acidic	R285 (2)(l)(iii)
Surface Treatments - Cleaning	Metal treatment processes if emissions are only emitted into in-plant environment – cleaning specifically	R285 (2)(r)(iv)
Deburring	tumbler (no vent)	R285 (2)(l)(vi)(B)
RO Wastewater Evaporator (2)	located in water treatment building	R 285(m), (R285 (2)(m))

Rule 287 Surface Coating Equipment:

PROCESS/ACTIVITY	ASSOCIATED EQUIPMENT	EXEMPTION
Oil Dip Vat/Tank	surface coating	R287(c), (R287(2)(C))

COMPLIANCE

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As previously indicated, previous environmental evaluations conducted indicated that processes onsite were exempt from Rule 201 permitting. Based on activities identified during the May 8, 2018, site inspection, it appears that most if not all activities onsite may be exempt from Rule 201 permitting, however, further clarification of activities and appropriate exemptions will need to be provided by the company. In addition, the company will be requested to initiate Rule 278 verification activities with respect to actual emissions. With the exception of clarification of Rule 278 emission levels and further clarification of Rule 201 exemptions by the Facility, no significant compliance issues were noted at the time of the inspection. Clarification of the above referenced issues are anticipated to be completed by the end of the present fiscal year.

NAME SGleBlanc

DATE 6/20/2018 SUPERVISOR SN