

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

N326743814

FACILITY: DAPCO INDUSTRIES		SRN / ID: N3267
LOCATION: 2500 BISHOP CIRCLE EAST, DEXTER		DISTRICT: Jackson
CITY: DEXTER		COUNTY: WASHTENAW
CONTACT: Jeff Cebulski , Manufacturing Engineer		ACTIVITY DATE: 03/22/2018
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, unannounced inspection of PTI 470-97 for a vapor degreaser utilizing MeCl ₂ and subject to 40 CFR Part 63, Subpart T for Halogenated Solvent Cleaning.		
RESOLVED COMPLAINTS:		

Contact

Jeff Cebulski
Manufacturing Engineer
734-426-8900 ext. 341
jcebulski@dapcoind.com

Purpose

This was a scheduled, unannounced inspection of the facility and equipment located at 2500 Bishop Circle East, Dexter, MI. I arrived at the facility at about 10:30am to conduct an inspection of Permit to Install (PTI) 470-97 for a vapor degreaser. I met with Julie Koch and Jeff Cebulski.

Background

Dapco holds active PTI 470-97 for a vapor degreaser and contains enforceable conditions that limit the Potential to Emit (PTE) below major sources of Hazardous Air Pollutants (HAP), effectively opting out of the Title V program. Methylene Chloride (MeCl₂) is limited to 9.5 tons per year.

In addition to operating a vapor degreaser, the facility houses other operations that are otherwise exempt from requiring a PTI. These processes include CNC work and other metal machining, which Julie indicated have staff running two shifts per day, 5 days per week. The vapor degreaser has a single shift per day, five days per week, and not exceeding 10 hours per day.

The facility has recently requested a reduced reporting schedule, per Special Condition 16 of PTI 470-97. They have been reporting 12-month rolling emissions every month since the issuance of the permit, and also annually to the Michigan Air Emission Reporting System (MAERS).

The vapor degreaser is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63, Subpart T for Halogenated Solvent Cleaning. This classifies Dapco as a Category III fee source.

Compliance Evaluation

Dapco recently submitted their 2017 MAERS report, which indicates total MeCl₂ emission of 16,356 pounds or 8.18 tons. This is accounted for by monthly usage records and mass balance data that report 1,486 gallons of MeCl₂ used for the year. These are below the permitted limits of 9.5 tpy and 1,716 gallons per year as stated in Special Conditions (SC) 13 and 14, respectively.

While on site I inquired into the hours of use for the equipment and facility operations. Dapco employs one shift of workers from this work area, not exceeding 10 hours per day and 5 days per week. This work schedule limits the operation of the equipment to below the 10 hours per day as in SC 15. Other work areas have two shifts per day, but do not process materials through the vapor degreaser.

SC 16 discusses solvent record keeping and reporting. Dapco requested to reduce reporting to an annual basis while on site, which will be accepted and performed through their already annual MAERS submittal. Attached is

their most recent MAERS submittal and monthly solvent usage for reporting year (RY) 2017.

Dapco complies with NESHAP Subpart T through Option 4 under Table 2 of 40 CFR 63.463(b)(2)(i), which utilizes control combinations including a freeboard ratio of 1.0, reduced room draft, and superheated vapor zone. The unit was not operating during the inspection and the temperature at idle showed the vapor zone maintaining 119°F. This represents greater than 10°F above the boiling point of MeCl₂ (106°F) as included in the definition of "super heated vapor zone."

As this is an enclosed machine, the freeboard ratio is maintained at 1.0 by having the distance from the solvent/air interface to the top of the machine equal to the interior dimension, since these are one in the same. This was also evaluated during permit review.

Reduced room draft is achieved by physically isolating the machine in an area only used by staff that operate the equipment. The long plastic drapes as described in previous reports are still in place to minimize air drafts from other, more heavily trafficked work areas.

Included in the file is a test per 40 CFR 63.463(b)(2)(ii) that demonstrates the equipment was operating according to standards set by NESHAP Subpart T as having emissions below 0.045 pounds per hour per square foot of solvent/air interface area. This is an alternative to the above described control combination in Option 4.

Also attached is a recent Degreaser Maintenance Log. Included are checks on drums of solvent used and shipped out to waste, chip tray cleaning, and daily maintenance on the hoist, leaks, cooling lines, water level, vapor zone, containment drain, and air pressure. These appear to cover all necessary operational practices, monitoring, and record keeping practices as outlined in PTI 470-97 and NESHAP Subpart T.

Compliance Determination

After on site inspection of the vapor degreaser and review of necessary recordkeeping documents, it has been determined that this facility is in compliance with State of Michigan and Federal Air rules and regulations including PTI 470-97 and 40 CFR Part 63, Subpart T.

Recommendations

I recommend this facility maintain annual emission reporting coinciding with yearly MAERS submittals.

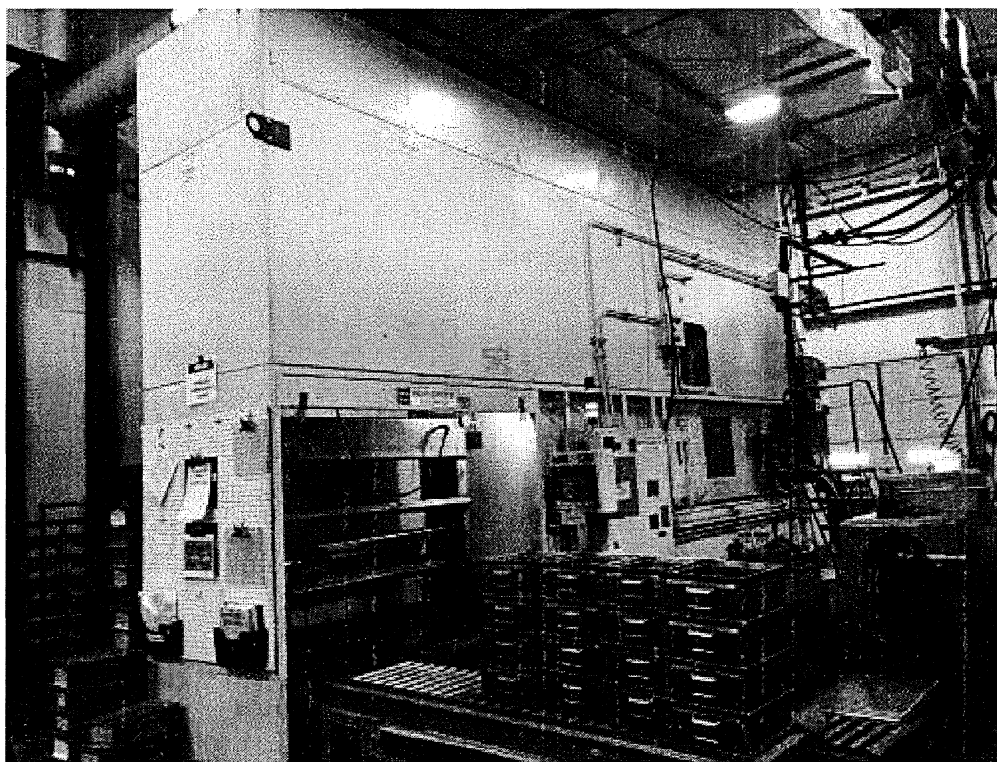


Image 1(Vapor Degreaser) : Vapor degreaser included in PTI 470-97.

NAME Falk Dulan

DATE 3/27/18

SUPERVISOR JL

