

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

N333726070

FACILITY: WILKIE BROTHERS CONVEYORS, INC.		SRN / ID: N3337
LOCATION: 1765 MICHIGAN AVENUE, MARYSVILLE		DISTRICT: Southeast Michigan
CITY: MARYSVILLE		COUNTY: SAINT CLAIR
CONTACT: Joe Kammer , Foreman		ACTIVITY DATE: 07/23/2014
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

Wilkie Brothers Conveyors, Inc. (SRN N3337) located at 1765 Michigan Avenue, Marysville, Michigan. The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994 and the requirements of the Permit to Install (PTI) No. 1326-91.

I arrived at the facility at about 1:30 PM. At the facility, I met Mr. Joe Kammer, Plant Foreman. I introduced myself and stated the purpose of the visit.

During the pre-inspection meeting, we discussed the plant operations. The building houses three businesses owned by the same management. Wilkie Brothers, Inc. American Metal Rebuilders (AMR), and Trolley Rebuilders, Inc. (TRI) are involved in rebuilding of conveyors used at industrial sites. Bluewater Manufacturing is a separate company operated by the same management and it builds new conveyors. The remanufacturing process involves disassembling and assembling of conveyors chains and chain components. The conveyors are used mostly by the Big 3 automotive groups.

The facility has 6 burn-off ovens, 4 shot blasters, one paint booth, two parts washers, two welding centers, and one acid cleaning process. The facility operates 5 days per week (M-F), 1 shift and employs about 20 people.

The acid cleaning is used to remove grease and oil from the used conveyor chains. The hydrochloric acid (31-35%) cleaning process involves acid cleaning, water rinse, hydroxide cleaning, water rinse and rust prevention treatment (surface treatment). The emissions are exhausted into the general-in-plant environment. This process is exempt from permit to install requirements pursuant to Rule 285(r)(i).

The used parts are also cleaned in the burn-off ovens. Blue Surf Burn-Off Ovens (Model No. 6606 and 6610) are covered by PTI No. 1326-91. These two ovens (Model 6606 and 6610) are identified in the facility as No. 4710 and 4720 respectively. Mr. Kammer told me that Oven No. 4710 is still operating and will be kept. Oven No. 4720 is currently not operating and will be remove off-site in the future. The other four Burn-Off ovens are identified as:

No. 4730 - Operating- Will be kept
No. 4740 - Not operational currently, but will be repaired
No. 4750 - Will be removed off-site
No. 4760 - Will be removed off-site

The facility installed these four ovens without a permit to install. I informed Mr. Kammer that installing these burn-off ovens without a permit to install is a violation of the Rule 201.

Later he accompanied me for an inspection of the facility. Initially we inspected the 6 burn-off ovens. At the time of my inspection Oven No. 4710 was operating. The main burner temperature was at 710oF. The afterburner was set at 1600oF, but the temperature reading was showing "Error". I informed him that the temperature monitor should show the correct operating temperature of the afterburner. One of the six burn-off ovens were operating at time of my inspection.

PTI No.: 1326-91

SC No: 14- Visible emissions from the burn-off oven shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a)- The oven was operating at the time I arrived at the facility. I did not observe any visible emissions from the stack. The oven appears to be in compliance with this requirement.

SC No. 15- Shall not operate the burn-off oven unless a minimum temperature of 1400oF in the afterburner is maintained. The afterburner temperature was set at 1600oF, but actual temperature reading was not shown on the screen. Therefore compliance was not verified. This is a violation of Rule 910, which requires that an air-cleaning device shall be installed, maintained and operated in a satisfactory manner.

SC No. 16- The exhaust gases from the burn-oven shall be discharged unobstructed vertically upwards to the ambient air from a stack with a diameter of 12-inches at an exit point not less than 35 feet above ground level. The stack dimensions were not verified, but appear to be in compliance with the requirements.

SC No. 17- Applicant shall not substitute any material and fuel for those described in the permit application which would result in an appreciable in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the air quality division. The facility appears to be using the same material and fuel as described in the PTI application.

Next we visited the acid cleaning process. The acid tank has dike around to prevent any spill go into the sewer system. The facility has a paint spray booth. He told me that they use about 30 gallons per 6 months. . I informed him to keep purchase records to show compliance with the coating usage. I observed that some of the filters were not in place. I informed him that they filters should be placed properly to capture any overspray. He fixed the filters and told me that he will instruct the operators to keep the filters in place. The paint booth is exempt from the PTI requirements pursuant to Rule 287(c).

The facility has two welding stations. Welding process is exempt from PTI requirements pursuant to Rule 285(i). The facility also has four shot blasters. The exhaust from 2 of these shot blasters are controlled by a common baghouse and exhausted to outer atmosphere. The other two shot blasters have individual baghouse and exhausted to the outer atmosphere. The process exempt from permit to install pursuant to R281(d).

The facility also uses 2 parts washers using mineral spirits. I observed that the covers for these parts washers were closed. The cold cleaning process is subject to Rule 707 and exempt from permit to install requirements pursuant to Rule 281(h). I provided him with the operating procedure prepared by MDEQ to be posted in a accessible, conspicuous location near the cold cleaner, as required by R707(4). The facility also has a soap washer which they are not using.

I obtained MSDSs for the mineral spirit and hydrochloric acid, which are attached for review.

Conclusion: The facility installed four burn-off ovens prior to obtaining permit to install. This is a violation of Rule 201 (R336.1201). A QD could not verify the operating temperature of the permitted oven which was operating at the time of the inspection. This is a violation of the Rule 910 (R336.1910) and Special Condition 15 of PTI No. 1326-91. A Violation Notice seeking compliance with these violations is recommended.

NAME S. Ballumkal

DATE 8/28/14

SUPERVISOR

CJE