NEOTA LCOOP

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

		0 DNI / ID- NI5074
FACILITY: The Dangler Guys		SRN / ID: N5071
LOCATION: 620 9TH AVE, TAWAS CITY		DISTRICT: Saginaw Bay
CITY: TAWAS CITY		COUNTY: IOSCO
CONTACT: Brad Hatcher, President		ACTIVITY DATE: 08/17/2018
STAFF: Meg Sheehan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Target site inspection	on of facility with new owners and processes.	
RESOLVED COMPLAINTS:		

On Tuesday, July 17, 2018, a scheduled, unannounced site inspection was conducted by AQD District staff at The Dangler Guys facility in Tawas City, losco County, Michigan. The referenced facility was previously occupied by Cooper Standard Automotive until 2008, when it was purchased by AuSable Industries, LLC. AuSable Industries closed in April 2018. The Dangler Guys has occupied the building since then. Permits associated with previous processes and owners were voided in 2000 and 2006. The Dangler Guys President Brad Hatcher provided a tour and answered questions. Some of the facility was in operation upon arrival.

# FACILITY DESCRIPTION

The Dangler Guys manufactures cathode danglers for the barrel plating industry. The danglers are made of electrical cable, ethylene propylene diene monomer (EPDM) rubber, and plastic. Some of the danglers are coated in a bright orange plastisol for certain orders. All parts are purchased and assembled onsite. See attachment for a simplified diagram of the barrel plating process, as well as a couple examples of danglers produced by The Dangler Guys. It should be noted that no barrel plating is performed at the site.

### PROCESSES

Processes of air pollution concern include a small plastisol coating operation. Welding cables are purchased from a couple of different suppliers (Southwire and General Cable), placed into one of three ovens, heated, dipped in plastisol and allowed to cool. Two of the ovens are electric powered; each goes through a three-hour preheat and then a four-hour bake, where the cables are heated to 335 F before they are removed and dipped in plastisol. The other oven is natural gas fired and goes through a 25-minute preheat and 20-minute bake where the wires are heated to 400 F. Mr. Hatcher reported that the natural gas oven is only used for large rush orders, about one time every three days. Approximately ½ gallon of plastisol is used per batch of cables (1 batch = 25 cables). The coating operation is vented in-plant and was not in operation during the inspection.

## COMPLIANCE EVALUATION

Two of the ovens are electric powered, rated at less than 10 MMBtu/Hr. The other oven is natural gas fired, rated at 1,000,000 Btu/Hr. Based on this information provided by the source, it appears these ovens may be exempt under Rule 282(2)(a). The coating portion of the process may be exempt under Rule 287(c), which would require monthly recordkeeping. An alternative to this exemption would be Rule 291. Calculations were performed to determine the applicability of this exemption and are attached to this report, as well as the Material Safety Data Sheet for the plastisol coating. Based on information provided by the source, it appears that the plastisol coating operation may be exempt under Rule 291.

Southwire was contacted by AQD staff to determine if there would be emissions from heating the cables. Email correspondence as well as additional information is attached to this report, but based on their findings, the EPDM rubber jacket on the cables would not produce "significant emissions."

During the inspection, Mr. Hatcher reported there is currently a parts cleaner and natural gas oven onsite, left by the previous owners. He was in the process of having the oven removed while I was there and was still waiting for someone to pick the parts cleaner up. Mr. Hatcher reported he had no intentions of using the parts cleaner and it appeared to have not been used in some time during the inspection.

## COMPLIANCE DETERMINATION

At this time, The Dangler Guys appears to be in general compliance with all applicable rules and regulations. Additionally, based on the processes that were observed during the inspection as well as information provided by the source, it appears the facility does not need to apply for an air permit at this time. Mr. Hatcher was advised that if there were any changes or additions to his process, they may be subject to permitting or another Rule 291 demonstration would need to be submitted. He was provided with the Permit to Install Exemption Handbook, as well as the phone number to the Environmental Support Center.

NAME May Sheehen

DATE 8/10/18

bare SUPERVISOR\_