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

N532931492

FACILITY: MICHIGAN WIRE PROCESSING CO		SRN / ID: N5329
LOCATION: 138 WATER ST, LOWELL		DISTRICT: Grand Rapids
CITY: LOWELL		COUNTY: KENT
CONTACT: Kevin Day , Owner		ACTIVITY DATE: 06/24/2015
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules and regulations and PTI No. 421-94, Revised December 22, 1994. Prior to and following the inspection staff drove around the area. There weren't any obvious issues of concern with odors, malfunctions or fugitive emissions. DP met with Kevin Day, Quality & Technical Services Manager, and Rich DesCoteaus, Operations Manager, after a brief introduction and discussion, DP explained the purpose of the inspection and reviewed the Environmental Inspection brochure.

This facility uses a pickling process to process a steel cable less than 1" in diameter coiled into a pile to the size of a large spool ~2 feet high by 3 feet in diameter. After being treated the steel cable is sold and used to manufacture bolts and screws. They currently employ 40 people, two shifts 5 days a week at this plant. They do have a second plant in Lowell but currently they do not have any production at the second plant but may be moving over there in the coming months. DP suggested that they come in for a PTI for the new location and also explained about the permitting classes in Lansing.

There are two lines in the plant, line one is used to treat the steel coils and has a lime, lube, cold rinse, phosphate, neutralizer, cold rinse, sulfuric acid, cold rinse, then sodium hydroxide caustic cleaner. This 2,000 gallon sulfuric acid tank is not vented to the scrubber. The second line used to treat the steel coils has a lime, lube, cold rinse, phosphate, neutralizer, cold rinse, sulfuric acid, black lube, cold rinse, then sodium hydroxide caustic cleaner. This 3,500 gallon sulfuric acid tank is vented to the scrubber.
There is a blanket around the tank to limit in plant emissions for worker protection. A liquid flow meter consisting of a tube with a sight glass has been installed to verify water flow in the scrubber.
Since the last inspection they have started to recycle / reclaim the acid at a significant cost savings.

Records were submitted electronically and were based on purchase records for the past 12 months (see attached). No testing was required as part of this compliance inspection and both record keeping and testing conditions were removed from this report. DP did explain the importance of recordkeeping and the requirements of the PTI. No VN was issued since the emissions are below the emission limits and the company is using recycling and reclaim. DP will follow-up in the next fiscal year to see if they are moving and to verify they have improved their recordkeeping.

PTI No. 421-94 SPECIAL CONDITIONS
The sulfuric acid emission rate from the metal acid treatment process, hereinafter "process", with an exhaust wet scrubber, hereinafter "control", shall not exceed 0.022 pound per hour nor 0.1 ton (200 pounds) per 12-month rolling period. Based on the records provided, the company claims 94% control efficiency and 6% emitted or 96 pounds for a 12 month period, which equals 0.024 pounds per hour. Even at 75% control efficiency and 25% emitted the company would still be in compliance with the emission limits. At 25% they would be emitting 182 pounds per 12-month rolling period and 0.045 pounds per hour.

Visible emissions from the process shall not exceed 0% opacity. No opacity noted before, after or during this inspection.

Applicant shall not operate the process unless the control is installed and operating properly. Control equipment appeared to be operating properly based on draw and lack of odors outside.

Applicant shall equip and maintain the control with a liquid flow indicator. This condition was not verified during this inspection as no roof inspection was conducted.

The exhaust gases from the process shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 42 inches at an exit point not less than 30 feet above ground level. From the ground it appears the stack is in compliance with the required dimensions.

Based on the physical inspection and the records provided, the company appears to be in compliance with state and federal Air Quality rules and regulations and PTI No. 421-94.

NAME Denise Rogers DATE 9-29-15 SUPERVISOR PAB