

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

N690850209

FACILITY: A & C Electric		SRN / ID: N6908
LOCATION: 41225 Irwin Road, HARRISON TWP		DISTRICT: Southeast Michigan
CITY: HARRISON TWP		COUNTY: MACOMB
CONTACT: Dan Arker, President		ACTIVITY DATE: 08/23/2019
STAFF: Kaitlyn Leffert	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2019 Scheduled Inspection		
RESOLVED COMPLAINTS:		

On August 23rd, 2019, I conducted a scheduled inspection of A&C Electric, located at 41225 Irwin Road, Harrison Township, MI. A&C Electric is an electric motor repair facility that is permitted to operate a heat cleaning oven. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and Permit to Install (PTI) Number 344-00.

I arrived on site and introduced myself to Daniel Arker, President of A&C Electric. I explained the purpose of my visit. We started by going over the required recordkeeping, followed by a walk-through of the facility.

Recordkeeping

AC Electric is required to keep records of the total hours that the oven is operating, continuous records of the afterburner temperature while the oven is operating, and pounds of wire processed through the burn-off oven. Mr. Arker supplied me with a record that identifies the date material was processed in the oven, the type of material processed, and the total pounds of material processed (attached).

PTI No. 344-00 S.C. 5 limits the quantity of coated wire that can be processed in any given batch to 300 pounds. The records provided during the inspection indicate that there have been multiple batches processed so far this year that exceed the 300 pounds limit. The highest recorded quantity processed was 900 pounds on May 15th. I talked with Mr. Arker and he informed me that the total weight is currently being recorded, but that the wire only makes up a certain percentage of that. I informed him that this was a violation of the permit and his records need to accurately document the quantity of wire processed, not total material. A violation notice will be sent, for violation of S.C. 5 and 13.

I also reviewed copies of the afterburner temperature records. I noted that the dates of the temperature records matched with the dates of the records of the materials processed. Copies of temperature records for the most recent batches processed in the oven are attached. S.C. 6 requires that afterburner temperature should be maintained above 1400°F. The records provided indicate that the oven was typically operating around 1600°F.

Facility Walk-Through

We then did a walk-through of the facility. The burn-off oven was not operating on the day of my inspection. I noted that operating procedures and a sign to not open the oven after the cycle has started were posted in a conspicuous place near the oven, as is required by S.C. 8. Visible emissions from the burn-off oven are limited to a 6-minute average of 5% opacity (S.C. 3). Since the oven was not operating, I did not assess compliance with the visible emission limit.

The permit prohibits A&C Electric from processing any asbestos or chlorine-containing wire insulation. Mr. Aker informed me that none of the wire insulation processed at the site contains asbestos or chlorine.

In addition to the permitted burn-off oven, the company also operates a wire coating process, aqueous parts washer, dismantling and assembly process, and a cold cleaner. Previous inspections had identified that the cold cleaner was not properly operated and that the lid was not closed. During my inspection, I observed that the cold cleaner was closed and that operating instructions were posted near the cold cleaner.

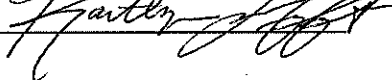
Wire Coating Process

During the previous inspection in 2018, A&C Electric received a violation notice for operating a wire coating process without a permit to install. In response to the violation notice, the company was able to demonstrate that

this process is exempt from the requirement to obtain a permit to install by using Rule 287(2)(c). The exemption applies to lines with a coating usage rate under 200 gallons of coating applied per month. During my inspection, I reviewed updated records of the varnish used in the wire coating process (attached). Monthly records indicate that well under 200 gallons is being applied per month, with a total of 110 gallons applied so far in 2019. Therefore, it appears that this process continues to qualify for the Rule 287(2)(c) exemption.

Conclusion

A&C Electric has not been maintaining adequate records of the quantity of wire processed in the burn-off oven. The permit requires that records be kept of pounds of coated wire processed in each batch. The facility was instead maintaining records of total weight of each batch, including other non-wire materials. A&C Electric will be sent a violation notice for violation PTI No. 344-00, Condition 5 and 13.

NAME  DATE 9/25/19 SUPERVISOR SK