Page 1 of 2

UG3 15 11780 DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY DEPORT. OF MINISTER IN FY2015 INSP-ACTIVITY REPORT: Self Initiated Inspection

U63151178031802	
FACILITY: Brooks Utility Products	SRN / ID: U631511780
LOCATION: 23847 Industrial Park Drive	DISTRICT: Southeast Michigan
CITY: Farmington Hills	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 10/06/2015
STAFF: Iranna Konanahalli /// COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2016 inspection of Brooks Utility Products	
RESOLVED COMPLAINTS:	· · · · · · · · · · · · · · · · · · ·

## 23847 Industrial Park Drive Farmington Hills, Michigan 48335-2860

## Permit-to-Install: Rule 285 exempt process equipment for Miscellaneous Particulate Emission processes with Dust Hog (cartridge filters) and with in-plant exhaust release.

On October 06, 2015, I conducted a level-2 self-initiated inspection of Brooks Utility Products ("Brooks"), a Tyden Group Company, located at 23847 Industrial Park Drive, Farmington Hills, Michigan. The inspection was conducted to determine 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 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Chuck Jackson (Phone: 248-477-0040-ext. 251; Fax: 248-477-2583; Cell: NA; E-mail: cJackson@brooksutility.com), Maintenance Tech, assisted me. Mr. John Robins (Phone: 248-477-0040; E-mail: jRobins@brooksutility.com), Plant Manager, was also present but did not participate in the plant tour.

The inspection was conducted as result of scheduled inspection at 23890 Industrial Park Drive, Farmington Hills, Michigan 48335-2871 (N1902). Brooks Utility Products uses 23890 Industrial Park Drive building (N1902) only for warehousing (office space is used for marketing) for its manufacturing facility across street, 23847 Industrial Park Drive, Farmington Hills, Michigan.

At 23847 Industrial Park Drive, Brooks manufactures electric utility meter boxes and receptacles. Brooks does not make any metering components and attendant electronics; only meter boxes.

Manufacturing of the boxes involves machines for punching, milling, stamping, etc. and assembly. A press room with five large presses is present. Water based coolant is used in stamping processes. Assembly areas are present. All exhaust is released to in-plant environment. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I).

## CNC, Punching, milling machines

Two (2) CNC, five (5) hole-punching, two (2) milling machines are present. Each machine has

its own capture device (flexible hose to position at an emission source, suction to provide sufficient capture velocity) for particulate matter emissions. The captured particulate laden exhaust gases are transported via a common manifold to one (1) Dust Hog cartridge filter system consisting of six (6) cartridge filters. The filters are cleaned using a pulse-jet air technology. Frequency is one pulse-jet air per minute per filter. The filter system is equipped with Magneheilic gauge to monitor pressure drop ( $\Delta P$ ) across the filters. The cartridge filters are replaced once per year;  $\Delta P$  may be used in conjunction with the period of service (time) to change filters.

Dust Hog is equipped with two (2) 55-gallon drums for collection of captured dust. The exhaust gases upon cleaning using Dust Hog are released to in-plant environment in all seasons (heating and cooling).

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 (I).

## Conclusion

The machines are exempt from Rule 336.1201 (Permit-to-Install) per Rule 336.1285.

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10/19/2015