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

<u>N131428778</u>			
FACILITY: GLADWIN METAL I	PROCESSING	SRN / ID: N1314	
LOCATION: 795 EAST MAPLE	STREET, GLADWIN	DISTRICT: Saginaw Bay	
CITY: GLADWIN		COUNTY: GLADWIN	
CONTACT:		ACTIVITY DATE: 02/26/2015	
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR	
SUBJECT: Scheduled site insp	ection for minor source in Gladwin County.		
RESOLVED COMPLAINTS:	······································		

On Thursday, February 26, 2015, Saginaw Bay District AQD site inspectors arrived onsite to conduct a scheduled site inspection for the Gladwin Metal Processing, Inc. (SRN N1314). The referenced facility was issued a General Permit on October 30, 2006 for a Natural Gas-Fired Burnoff Oven located at 795 East Maple Street, Gladwin, Gladwin County, Michigan. Site inspection was conducted with the intent of confirming operational status as well as compliance with the referenced permit.

FACILITY DESCRIPTION

Located on the northwest corner of the intersection of Industrial Drive and Maple Drive, the subject site is located approximately 1 block north of Cedar Street (M-61), Gladwin, Michigan. Located within the city limits the facility consists of a single story building.

Based on available information, the facility provides multiple metal coating services: zinc phosphating and pickle process, powder coating and electrostatic painting processes for a range of clients.

COMPLIANCE HISTORY

The AQD database indicates that there are two voided and one active permit of record for the site.

Permit No.	Assoc. Equipment	Approval Date	Void Date	Comment
184-86	Automatic water base paint line	4/9/86	10/17/2006	R. 336.1287 (c) exemption
121-88	Paint Spray Booth	6/2/88	10/17/2006	Equipment removed
331-06	Burn Off Oven	10/30/2006	NA	Active

A Letter of Violation was issued for the Facility on October 3, 2006 for failing to permit the Burn-off oven prior to installation. A Notice of Violation was issued on September 30, 2011, to the referenced facility for failing to maintain proper records for the burnoff oven temperature. Both violations were resolved in a timely manner.

No complaints are of record for the facility. The facility is not required to submit annual emissions reports.

COMPLIANCE EVALUATION

The facility was open and operating upon arrival. Information provided during the site inspection indicated that the coating and metal treatment processes used onsite meet exemption under the following exemptions:

- R 336.1287(c) (surface coating equipment),
- R 336.1285(I)(iii) (surface prep by aqueous solutions),

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- R 336.1285(I) (vi) (C) (sand blasting) and
- R 336.1285 (r) (metal treatment processes).

<u>Process Equipment</u> -- Actively used equipment onsite include two electrostatic (aka Bell) paint booths, and associated lines, a powder coating booth, batch oven for powder coatings, water pressure wash booth, and a sand blasting booth with cyclone. As previously mentioned, the referenced equipment appears to be exempt from permitting based on the present use.

Permitted equipment is limited to the natural gas-fired, blu-surf Model 6606 burn off oven (Jackson Oven Supply Co. Jackson, MI) used by the facility to remove paint, oil or grease from equipment hangers and parts. The equipment onsite was consistent with information provided in the application package for General Permit No. 331-06. The unit is equipped with a secondary chamber that runs at a pre-set 1400 degrees F and 0.5 second minimum retention time (SC 1.6). In addition the burn off oven is equipped with an automatic temperature control system for the primary and secondary chambers (SC 1.7) with an automatic shutoff if the unit is not operating properly (SC 1.8).

Equipment operating at the time of the inspection included one bell line.

<u>Material Use –</u> Available records indicated that the facility used less than 100 gallons per month of water based coatings. The facility maintains copies of the MSDS sheets and purchase records for the coatings used onsite, which also meets the requirements for SC 1.13, which requires a current listing from the manufacturer of the chemical composition of all materials processed in the burn-off oven.

The burn-off oven was reported to be fueled only with natural gas (SC 1.2). In addition, the facility reported that the burn-off oven was used <u>only</u> to remove cured paints, oil or grease on metal parts, racks and hangers (SC 1.3, 1.4 and 1.5).

<u>Visible Emissions</u> – No visible emissions were noted from the burn-off oven stack (SC 1.1) or other process equipment onsite. The stack associated with the burn-off oven is unobstructed, and approximately 22 feet above ground level, which meets the permit conditions of a minimum of 1.5 times the building height (10 feet) (SC 1.15).

<u>Monitoring</u> – The permitted burn-off oven is equipped with a continuous monitor for the temperature in the burn-off oven secondary chamber or afterburner. The readout is digital, and is clearly visible. Oven operation is dependent on work orders, and has a cycle of approximately 6-7 hours from start-up to cool down.

<u>Recordkeeping/Reporting/Notification</u> –SC 1.11 requires that the facility will maintain satisfactory temperature data records for the burn-off oven secondary chamber/afterburner. SC 1.9 requires that the temperature data be collected once every 15 minutes. Since the 2011 site inspection, the facility has had installed a continuous temperature recorder for the oven the oven, which has a programmable control and digital readout.

In addition SC 1.12 requires that the facility maintains records of the date, duration, and description of any malfunction of the control equipment, and any maintenance performed and testing results for the burn-off oven. The facility reports that the unit has not had a lot of trouble, and that a serviceman is onsite about once per year for annual activities.

<u>Other</u> – The facility maintains onsite the manufacturer's startup-shutdown instructions and equipment manual for the burn-off oven (SC1.14). No modification or replacement of the burn-off oven has taken place, so conditions of SC 1.16 do not apply.

SC 1.10 requires the calibration of the thermocouples associated with the primary and secondary chambers at least once per year. These activities are reported to be conducted with the annual service visit.

Summary -

On Thursday, February 26, 2015, Saginaw Bay District AQD site inspectors arrived onsite to conduct a scheduled site inspection for the Gladwin Metal Processing, Inc. (SRN N1314). The referenced facility was issued a General Permit on October 30, 2006 for a Natural Gas-Fired Burnoff Oven located at 795 East Maple Street, Gladwin, Gladwin County, Michigan. Site inspection was conducted with the intent of confirming operational status as well as compliance with the referenced permit.

Based on available information, the facility provides multiple metal coating services: dip painting, zinc phosphating and pickle process, powder coating and electrostatic painting processes for a range of clients.

The AQD database indicates that there are two voided and one active permit (331-06) of record for the site.

A Letter of Violation was issued for the Facility on October 3, 2006 for failing to permit the burn-off oven prior to installation. A Notice of Violation was issued to the referenced facility on September 30, 2011, for failing to maintain proper records for the burn-off oven temperature. Both violations were resolved in a timely manner.

No complaints are of record for the facility. The facility is not required to submit annual emissions reports. No additional compliance issues were noted during the site inspection. The facility is operating in general compliance with their permit.

NAME Marsh Multicuc DATE 3/16/2015 SUPERVISOR C. Have

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