DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

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FACILITY: Capital Steel & Wire, Inc.	SRN / ID: N2012				
LOCATION: 805 Hull Road, MASON	DISTRICT: Lansing				
CITY: MASON	COUNTY: INGHAM				
CONTACT: Fred Render , Director o	ACTIVITY DATE : 06/10/2024				
STAFF: Loren Hicks	COMPLIANCE STATUS: Compliance	SOURCE CLASS:			
SUBJECT: Regular unscheduled on-site inspection.					
RESOLVED COMPLAINTS:					

On June 10, 2024, EGLE-AQD (represented by L. Hicks) conducted a regular, unscheduled inspection of the former Schultz, Snyder, & Steele facility, which had not been previously inspected by the AQD. The purpose of this inspection was to confirm whether the equipment and associated processes permitted for this facility are still in operation and to assess whether any new equipment and associated processes requiring a permit have since been installed. PTI 784-88 was issued to Schultz, Snyder & Steele, manufacturer of hardwood, in 1988 for a sawdust removal system consisting of two blowers, each with an exhaust pipe powered by a squirrel cage coupled to a gravity type separator. The facility was acquired by NOR PAC in 1994, then by North Pacific Group, Inc. in 2005, and finally by Capital Wire & Steel in 2001. Capital Steel & Wire is a producer and supplier of domestic and international steel bar, steel wire, and wire rod.

On May 31, 2024, I made an initial visit to the facility, but management was not onsite at the time, and production staff stated that they could not give tours unannounced, so I left my business card and informed them that I'd return later. On June 10, 2024, I paid a second visit; I was buzzed in at the gate, and staff directed me to the staff parking lot, and then the offices. No odors or visible emissions were noted on arrival.

I met with Jeff Witt in the office, and he showed me to their meeting room and told me about their business/production until Fred Render was available to meet with me. Mr. Witt first showed me their storage barn where the permitted sawdust removal system had originally been housed and then stored. The barn is used for storage now, and the permitted system has been partially disassembled and removed. Some of the housing and ductwork still stands, but I did not locate either of the squirrel-cages or separators. The permitted system is no longer in use and has been deconstructed in a way that would require a new permit to be obtained for its reconstruction, as per Rule 201. Therefore, I have requested that the original permit be voided.

When Mr. Render arrived, we donned PPE and toured the production floor; he also shared more details about their business. This plant receives steel bars, draws and/or cuts them and then ships them out for finishing elsewhere. Their facility houses ten CNC cold saws and one cold draw mill, which I believe to be exempt under R1285(I)(vi)(B) and R1285(I)(i)(B), respectively. There are no noted stacks or external vents to atmosphere; all emissions are to the general in-plant environment. They do operate a small machine shop, primarily to make custom parts for their cold draw mill (an interesting historical aside, the cold draw mill was originally built as part of the WW2 war effort). They do not operate a parts washer or a backup generator. They do have a recycling program for their waste oil & metal shavings; the absorptive oil pads are collected in barrels and the metal shavings are collected in

bins, then sent out for reclamation. Capital Wire & Steel operates several plants: the one I was visiting in Mason (and another 'just down the road'), one near Detroit, and one currently under construction in Ithaca, in addition to their offices in DeWitt.

In conclusion, the equipment originally permitted under PTI 784-88 is no longer operational and could not be made to be so without significant reconstruction; therefore, I have requested that PTI 784-88 be voided. The equipment currently being operated at the facility I believe to be exempt in its current configuration.

NAME Loren Hicks	DATE 6/18/24	supervisor <u>RB</u>
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