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

N394573746

FACILITY: ALCOTEC WIRE CORP		SRN / ID: N3945
LOCATION: 2750 AERO PARK DR, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT:		<b>ACTIVITY DATE:</b> 07/31/2024
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-Site Inspection & Records Review		
RESOLVED COMPLAINTS:		

On Wednesday, July 31, 2024, Caryn Owens and Tammie Puite of the Department of Environment, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted an on-site field inspection of Alcotec Wire Corporation (SRN: N3945) located at 2750 West Aero Park Court in Traverse City, Grand Traverse County, Michigan. More specifically, the entrance of the site is located on the south side of Aero Park Drive, approximately 2/5 mile west of the North Three Mile Road and Aero Park Drive intersection.

The field inspection and records review were to determine compliance with permit to install (PTI) 172-06. The site is considered a minor source of criteria air pollutants and an area source of hazardous air pollutants (HAPs).

## **Evaluation Summary**

The activities covered during this field inspection and records review appear to be in compliance with PTI 172-06. No further actions are necessary at this time. Specific permit conditions that were reviewed are discussed below.

## On-site Inspection:

The weather conditions were cloudy, with calm variable winds, and 77 degrees Fahrenheit. Activities onsite generally includes equipment used to draw aluminum through fixed die trains of different sizes to final diameters used in welding processes. The wire is cleaned using mineral spirits and isopropyl alcohol. The isopropyl alcohol solvent is used to clean and lubricate the wire during spooling processes, the mineral spirit solvent is used to clean the wire during secondary drawing processes. They currently operate four 10-hour days, Monday through Thursday, 2 shifts starting at 6 am and 8 pm. There were a few different lines in the plant, that each breakdown the aluminum into a small diameter wire to the necessary size based on customer demand. There is a TIG line, a breakdown line, Isopropyl (spool) line and a drumline. The TIG line uses an oil emulsion, and contains an oil emulsion tank, there are shavings that come from the reduction of the metal which is captured and put into a compactor and then sold. There are 4 ovens at the facility. Oven 3 hasn't operated in at least 3 years, and most likely will not be used again. Ovens 1 and 2 are used most frequently and are in the northern portion of the building. The facility is currently looking into installing two exhausts for ovens 1 & 2 to help with the heat that is in plant when the ovens are operating. Oven 4 is on the southwestern portion of the building, and is operated on an as needed basis, which is not very often. Additionally, all the used mineral spirits are collected in a closed container, and then disposed of through a still system in the northern portion of the building. All the rags and soiled wastes are stored in sealed tight 55-gallon drums on the southeast portion of the site to be properly disposed of.

## **Records Reviewed**

FGWIRECLEAN: This flexible group consists of EUIPA (which is an aluminum wire cleaning system which consists of multiple closed box stations where wire is drawn through isopropyl alcohol laden solvent streams) and EUMINSPIRITS (which is an aluminum wire cleaning system which consists of multiple closed boxed stations where wire is drawn through mineral spirits laden solvent streams). This flexible group is not controlled and there are no associated stacks with this flexible group.

- Emission Limits: Emission limits were 63 tons of VOC per year based on a 12-month rolling time period. Based on the records reviewed from July 1, 2023 through June 30, 2024, the highest emissions reported were 16.3 tons of VOC per 12-month rolling time period, which is within the permitted emission limits.
- Material Limits: No Material Limits were applicable for FGWIRECLEAN.
- Process/Operational Restrictions: As previously stated, The facility collects all wastes, and stores the waste in the southeastern portion of the building, and stored in closed and properly labeled 55-gallon drums awaiting proper disposal.

All the VOC containing materials observed during the inspection were properly covered. AQD did not observe maintenance concerns from the waste solvents and VOC containing materials at the facility.

- Design/Equipment Parameters: There are no design and equipment parameters applicable for FGWIRECLEAN.
- Testing/Sampling: The facility assumes that the mineral spirits and isopropyl alcohol are 100 percent VOC. Based on this assumption, the facility is still below the 63 tons per year based on a 12-month rolling time period.
- . Monitoring/Recordkeeping: The facility keeps track on a written form of the isopropyl alcohol and mineral spirits system level, deliveries, usage, and waste on a monthly basis. The facility maintains records of each gallon of each solvent used, the VOC content of each solvent, the VOC mass emission calculations on a monthly and annual basis, based on a 12-month rolling time period. The facility completes all calculations and maintains records in an acceptable manner.
- Reporting: No Reporting Requirements are associated with FGWIRECLEAN.
- · Stack/Vent Restrictions: There are no stack/vent restrictions applicable for FGWIRECLEAN.
- Other Requirements: No Other Requirements applicable for FGWIRECLEAN.

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