

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self initiated inspection**

A063132524

FACILITY: DECKER MANUFACTURING CORP		SRN / ID: A0631
LOCATION: 703 NORTH CLARK, ALBION		DISTRICT: Kalamazoo
CITY: ALBION		COUNTY: CALHOUN
CONTACT: Earl Eagen , Plant Manager		ACTIVITY DATE: 12/10/2015
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On December 10, 2015, AQD staff (Rex Lane and Amanda Chapel) arrived at Decker Manufacturing, Inc. (Decker) located at 703 North Clark Street, Albion, MI to conduct an unannounced air quality inspection. Staff made contact with Mr. Earl Eagen, Plant Manager and stated the purpose of their visit. We went back to Mr. Eagen's office and staff provided him with their inspector credentials, business card and a copy of MDEQ's inspection brochure. Mr. Lonnie Coleman, Decker VP of Operations joined us shortly thereafter and provided MSDS sheets for various use chemicals as requested by the inspector. Mr. Coleman also showed staff a copy of a letter they sent to MDEQ-AQD regarding the removal of a chrome plating tank from the facility on 3/23/02. Staff noted that a copy of the letter was in the office facility file. Decker entered into an administrative consent order (AQD No. 37-2002) to resolve federal violations associated with the chrome plating tank and this order was eventually terminated on 7/14/06.

Staff asked Mr. Eagen several questions related to facility operations since it was last inspected by the AQD on 6/8/06 and determined to be in compliance with state air quality regulations. The facility commenced operations at this location in 1927 and has about 50 employees and operates one shift per day, five or six days per week. The facility manufactures a wide variety of steel based weld fasteners, nut and washer assemblies, pipe and drain plugs and special fasteners for automotive and structural applications. Staff asked and Mr. Eagen stated that the only parts coating at the facility is to apply a rust inhibitor following final washing and drying of parts. Staff also asked about the use of threadlock compounds and plating of assembled parts. Mr. Eagen indicated that any parts that require either application of threadlock compounds or require further corrosion resistance (i.e. plating, galvanizing, etc.) is completed by outside vendors. The facility does not have any emergency generators or boilers per Mr. Eagen.

Required PPE for inspection of the facility is safety glasses. Process equipment that was discussed and observed during the inspection that is considered to be exempt from air use permitting requirements is identified below:

- Steel wire up to two inches in diameter is received by the facility on spools and is sent through a drawing machine for reduction and to straighten the lead end for further processing. The drawing machine uses a granular powdered lubricant Chemdraw CHA.O Grind which contains no VOCs. The drawing process is exempt from air use permitting under Rule 285(l)(i).
- The facility has 53 cold head stamping machines that receive drawn wire and cuts and stamps the wire into nuts, fasteners, etc. and also punches a hole in the part if it needs to be threaded. The facility has 43 threading machines for cutting threads on the inside or outside of parts as needed. These machines use cutting oils and exhaust ducts to one of two internally vented oil mist separators (Smog Hog). There are additional Smog Hog units that collect oil mist from the general in-plant environment as well. Oil collected from the Smog Hog units is recycled back into the process. The cold head machines and threading machines are exempt from air use permitting under Rule 285(l)(i) and Rule 285(l)(vi)(B) respectively.
- In the tool area, the facility has an electrically fired heat treat oven for heat treating tooling parts only and a separate unheated oil quench tank. Oil is cleaned off the tooling parts before they go into the heat treat oven per prior email correspondence received from the facility. The heat treat oven is exempt from permitting per Rule 282(a)(i) and the quench tank is exempt per Rule 284(a).
- In the maintenance area, staff observed welding equipment and a variety of metal working equipment (drill press, grinders, etc.) that all vent in-plant. The welding equipment is exempt under Rule 285(i) and the metal working equipment under Rule 285(l)(vi)(B). There was also a small cold cleaner that had a closed lid and uses a 100% hydrotreated light distillate solvent for cleaning. Staff provided Mr. Eagen with MDEQ labels to post user instructions near the unit. The cold cleaner is exempt from permitting

under Rule 281(h).

- Machined parts are batch fed into a rotating drum filled with corn cob grits (i.e. cob peeler) to remove rust, burrs and other surface imperfections. The cob peeler is exempt from permitting per Rule 285(l)(vi) (B).
- The facility has a number of gas fired radiant heaters and air make up units. This equipment is exempt from permitting under Rule 282(b)(i).
- The facility has two gas fired alkaline and phosphate based washers to remove residual machining oils from parts prior to application of a rust inhibitor called Thermisol AQ BluCoat. The rust preventative is 70% mineral oil by weight which has a vapor pressure < 0.1 mm Hg. The process is exempt from permitting under Rule 281(e).

Staff thanked Mr. Eagen for the time and cooperation during the air quality inspection and left the facility around 4:15 pm. At the time of the inspection, it appears that all process equipment in use at the facility is exempt from permitting and in compliance with state air quality rules. -RIL

NAME RIL

DATE 12/15/15

SUPERVISOR MA 12/16/2015