

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

A746930328

FACILITY: ADVANCE ENGINEERING CO		SRN / ID: A7469
LOCATION: 12025 DIXIE AVE, REDFORD TWP		DISTRICT: Detroit
CITY: REDFORD TWP		COUNTY: WAYNE
CONTACT: Bill Hicks , Maintenance Manager		ACTIVITY DATE: 07/23/2015
STAFF: C. Nazaret Sandoval	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: 2015 Targeted Inspection - Follow-up Rule 208a		
RESOLVED COMPLAINTS:		

SRN: A7469
Source Name: Advance Engineering, Co. (AEC)
Facility Address: 12025 Dixie Ave., Redford, MI 48239
Inspection Date: July 23, 2015
Reason for Inspection: Targeted Inspection for FY 2015/Rule 208a follow-up
Inspected By: Nazaret Sandoval
Contact: Bill Hicks, Maintenance Manager, whicks@adveng.net
Contact Phone (cell): 313 268-3746

BACKGROUND INFORMATION

Advance Engineering, Co (AEC) produces small deep-drawn stampings and small precision stampings from both ferrous and non-ferrous metals.

Last year, on September 15, 2014, the Air Quality Division (AQD) conducted an inspection of the facility located at 12025 Dixie Ave., Redford, MI 48239.

During the opening discussion I was notified that the company was in the process of moving their equipment from the Redford location to a new and expanded facility in Canton where AEC would be consolidating the operations of three existing plants. I was told that the relocation was 50% completed.

As it was noted in the inspection report for last year visit, this source legally limits its potential to emit based on actual emissions and it is registered pursuant to the Michigan Air Pollution Control Rule R336.1208a (Rule 208a). AEC has been a 208a registered facility since April 16, 1997. Their registration number is WC-023-97. Rule 208a allows sources with actual emissions less than 50% of major thresholds to accept the 50% thresholds as legal limits on their potential to emit.

Our records indicate that certification required by Rule 208a has been renewed annually by the timely submittal of the registration form in conjunction with the annual emissions reporting (MAERS). The last registration on file, up to the day of this site visit is for calendar year 2014 and it was received on March 9, 2015.

A letter dated 06/27/14, was sent from AQD to all R208a sources notifying them about the rescinding of the Rule. The letter requested a follow up action from the responsible officials. Last week, the proposed changes to our Part 2 rules were posted on-line and in a few months the rule will be rescinded. Consequently, we are required to update our records with the most current information to reflect the status of SRN A7469 with respect to Rule 208a.

In summary, the main purpose of the site visit this year was two-folded:

- To evaluate if the facility has ceased all the operations at 12025 Dixie Ave., Redford, MI 48239a and completely moved its operations to Canton;
- To evaluate the compliance status with respect to the Rule 208a registration/ and the

rule rescinding issues.

MAERS REPORT REVIEW

MAERS submission is required based on Rule 208a requirements. MAERS for the emission period from 1/1/2014 to 12/31/2014 was received on 3/2/2015. I reviewed the report and the emissions appeared to have been accurately reported. The majority of the emissions resulting from the facility are a consequence of the solvent parts cleaning operations (VOC emissions), whereas only a small part of the total emissions are contributed to the grinding operations and from the gas fired boiler.

There was a significant increase in the parts washer throughput from last year. The records showed a total of 1,870 gals for year 2013 to 3,000 gals in 2014. This translated into an increase in VOC emissions from 6.26 tons to 10 tons.

The boiler operated on natural gas and it was used to generate the hot water supply for the entire Redford facility South Building, the kitchen sink, wash basin, as well as hot water supply to the tumbling parts washer. According to MAERS 2014, the gas natural throughput for the years 2014 was 1 MMCF. This is an estimated value which has been reported every year in MAERS. The emissions of pollutants (CO, NOx, PM, and SO2) generated from burning 1 MMCF are insignificant when compared with the 50% Major Source emission threshold.

INSPECTION NARRATIVE

On July 23, 2015, at 9:48 AM I arrived at 12025 Dixie Ave., Redford, MI 48239. I checked the main entrance to the building and there wasn't anybody available to open the door. I looked through the glass doors and windows of the complex and the building appeared to be completely empty. Additionally, there were signs on the front yard indicating that the building was available for lease.

I obtained additional information in relation to the closure of the facility in Redford. Mr. Bill Hicks indicated via email that AEC had completely moved from 12025 Dixie Ave., Redford, MI 48239 as of November 30, 2014. The keys were turned over to the landlord at that time. The operations are closed and the building has been turned back to the property owner. On July 27, 2015 we received a letter from Mr. Bill Hicks ratifying that AEC is no longer in business at the Redford location.

The objective of the AQD letter dated June 27, 2015 was to notify the facilities registered under the Rule 208a program that we were in the process of phasing out the registration program for limiting potential to emit by rescinding Rule 208a. The registered facilities needed to take action before the rule is rescinded. However, none of the options provided by AQD in that letter are applicable to the Redford operations because they are no longer in business at that location. The "consolidated" operations at the new facility in Canton will have a different SRN and the owner must seek a source classification under a separate process.

CONCLUSION

As a result of my observations which were validated by Mr. Hicks's communications, I conclude that AEC is no longer in business at the Redford location. Therefore, for our recordkeeping purposes, the source identified with the State Registration Number (SRN) A7469 will be considered inactive.

NAME *C. Andral*

DATE 7-28-15 SUPERVISOR *-JK*