

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

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|---|-------------------------------|---------------------------|
| FACILITY: ADRIAN STEEL CO                                     |                               | SRN / ID: B2288           |
| LOCATION: 906 JAMES ST, ADRIAN                                |                               | DISTRICT: Jackson         |
| CITY: ADRIAN  |                               | COUNTY: LENAWEE           |
| CONTACT: Randy Mark , Plant Manager                           |                               | ACTIVITY DATE: 03/17/2016 |
| STAFF: Michael Gabor  | COMPLIANCE STATUS: Compliance |                           |
| SUBJECT: Inspection of Adrian Steel Co., a True Minor Source. |                               | SOURCE CLASS: MINOR       |
| RESOLVED COMPLAINTS:  |                               |                           |

**Scheduled, Unannounced Inspection of Adrian Steel (Minor Source), located at 906 James Street, Adrian, Michigan 49221.**

**State Registration Number (SRN): B2288**

### Facility Contacts

**Randy Marks (RM), Plant Manager, 517-266-5185, [rmarks@adriansteel.com](mailto:rmarks@adriansteel.com)**

**Mark Logan (ML), Safety Director, 517-266-5220, [mlogan@adriansteel.com](mailto:mlogan@adriansteel.com)**

**Dale Leveck (DL), Maintenance Manager, 517-265-6194, [dleveck@adriansteel.com](mailto:dleveck@adriansteel.com)**

### Purpose

On March 17, 2016, I conducted a scheduled, unannounced inspection of the Adrian Steel (AS) facility located in Adrian, Michigan (Lenawee County) at 906 James Street. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly with the Michigan Natural Resources and Environmental Protection Act 451 of 1994, Part 55, Air Pollution Control and the administrative rules. This facility was last inspected on March 11, 2010.

### Facility Location

The facility is located within the city limits of Adrian. It is immediately surrounded by other commercial / industrial sources. A residential area is located immediately east of the facility.

### Arrival & Facility Contacts

Visible emissions or odors were not observed upon my approach to the facility via James Street. I arrived at approximately 1:45 pm, proceeded to the facility office to request access for an inspection, provided my identification to the receptionist, and asked if someone was available to meet with me. ML escorted me to their conference room, where we were joined by RM and DL. A pre-inspection conference was held with RM, ML, and DL. I provided a copy of the Michigan Department of Environmental Quality (MDEQ) brochures entitled *Rights and Responsibilities Environmental Regulatory Inspections and Boiler NESHAP Navigation Tool*. I also invited RM to complete the Department of Environmental Quality (DEQ) customer service survey available at the link on the provided brochure. I informed the facility representatives of my intent to conduct an inspection. The facility representatives extended their full cooperation during the inspection and RM, ML, and DL accompanied me during the site

tour portion of the inspection.

### Regulatory Applicability

The facility is a minor source and operates under several Permit to Install (PTI) exemptions found under the following Michigan Air Pollution Control Rules:

- R 336.1285(r)(iv) (Rule 285(r)(iv)) for metal treatment and cleaning, where emissions are only released into the general in-plant environment;
- Rule 287(d) for two booth enclosed powder coating operations with appropriate particulate controls and associated natural gas fired curing ovens (smaller line's oven rated at 3 million Btu per hour and the larger line's oven is rated at 4 million Btu per hour);
- Rule 282(b)(i) for two natural gas fired furnaces used to dry metal parts, each rated at 3 million Btu per hour;
- Rule 285(i) (welding of metal parts);
- Rule 285(l)(i) for the punching and stamping of metal parts; and
- Rule 285(l)(vi)(B) for laser cutting and machining of metal parts with all equipment venting to the in-plant environment.

The facility is also subject to Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart XXXXXX (6X), National Emission Standards for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Source Categories. Compliance with this rule was not evaluated.

### Facility Background

AS assembles and coats various metal cargo management systems (e.g. shelving, drawers, cabinets, partitions, ladder racks, aluminum toolboxes, and accessories) and other miscellaneous aftermarket parts / accessories for commercial vans and trucks. AS currently employs about 170 persons and operates two, eight hour shifts Monday through Friday.

### Pre-Inspection Meeting

The pre-inspection began with a background summary of AS, which was provided by RM, and is documented above. I asked whether AS experienced any recent issues or changes facility wide or with any of their air pollution control equipment. RM replied that no immediate issues were noted. He did share that the facility recently conducted indoor air quality testing to ensure adequate employee protection.

RM described their process, which includes machining and welding metal parts that are assembled to make various products. Afterwards, they are washed and a powder-based coating is applied in one of their two production lines. I requested to observe all of these processes during the site tour.

### Onsite Inspection Narrative

We then proceeded to conduct the site tour, which was predominantly led by RM. Both coating operations employed identical steps and components to wash and prepare parts for powder coating, but differed in the size of the powder coating booth and curing oven. I first observed the smaller coating line. The parts wash process

included four tank cleaning stations that vented to the in-plant environment, consistent with Rule 285(r). Tank 1 contained MetaPlex Phosplex 16 cleaning solution, which includes a low concentration of phosphoric acid. Tank 2 contained a neutralizing, basic solution, Bulk Neutralizer 14. Tank 3 contained rinse water. Tank 4 contained a basic pH sealer, E-CLPS 1700. SDSs are attached to this report for the chemicals used in Tanks 1, 2, and 4.

Then I observed the exempt natural gas fired furnace used to dry the parts prior to entering the fully enclosed powder coating booth. The booth's particulate filtration control system appeared to be operating satisfactorily (consistent with Rule 287(d)). I did not observe any visible emissions escaping from the booth or from the baghouse. After the coating application, the parts proceeded through a natural gas fired curing oven.

I then observed the second coating line having the larger powder coating booth and identical parts wash process. The larger booth's particulate emissions were controlled by a baghouse and appeared to be operating satisfactorily (consistent with Rule 287 (d)). I did not observe any visible emissions escaping from the booth or from the baghouse. I also observed this line's larger natural gas fired curing oven.

RM then showed me their other parts machining and assembly equipment, which all vented in-plant. Some of the equipment, such as the laser cutting equipment, had built-in particulate controls to filter the air prior to discharge.

#### Post-Inspection Meeting

We returned to the facility's conference room and held a brief post-inspection meeting. I informed the facility's representatives that I did not have any immediate compliance concerns. I thanked them for their cooperation and assistance, invited them to contact me in the future with any questions or concerns, and departed the facility at approximately 2:30 pm.

#### Recordkeeping Review

The PTI exemption rules AS operate under do not require specific records to be kept. Hence, no records were reviewed as a part of this inspection. SDSs were provided by the facility on March 23, 2016, per my request, and are attached to this report.

#### Compliance Summary

Based upon the visual observations, AS appears to be in substantial compliance with the applicable PTI exemption rules, under which they operate. Throughout the entire onsite inspection, RM, ML, and DL extended their full cooperation. Overall, I observed a well-organized and maintained operation.

NAME Michael M. Holz DATE 3/24/16 SUPERVISOR [Signature]