DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection 5

JRING CO	SRN / ID: 82289
E, ADRIAN	DISTRICT: Jackson
	COUNTY: LENAWEE
Superintendent	ACTIVITY DATE: 08/20/2014
COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
ted inspection of spray coating booths and one trichlo	proethylene degreaser.

SRN: B2289

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Company Name: Aget Manufacturing Company Address 1408 E. Church Street, Adrian, MI 49221 Company Contact: Jim Previch, Plant Manager Company Contact e-mail: jprevich@agetmfg.com

Introduction: Aget Manufacturing is a manufacturer of particulate matter collectors. They engineer and fabricate collectors for all types of particulate matter including ones with special properties, such as flammable, combustible or corrosive in nature. Aget Manufacturing was purchased by DEPIERRE Industries, effective April 30, 2014 and will continue to do business as Aget Manufacturing. Information about Aget's history, products and applications were printed from their website and are attached.

<u>Purpose</u>: An unannounced scheduled inspection was attempted on July 10, 2014. I arrived at the lobby of the company at approximately 10:08 a.m. Posted instructions were to call the person you need to see, so I called Mr. Previch's number and left a message that I was there to conduct an inspection based upon the permit. I then called the operator and told her that I was trying to get in touch with Mr. Previch. She told me that he was on vacation and would not return until July 16, 2014. I thanked her and left at approximately 10:09 a.m. The company has a permit to install 362-96 for a vapor degreasing operation and two spray coating operations. The facility is also subject to 40 CFR 63 Subpart T – National Emission Standards for Halogenated Solvent Cleaning, which has operational requirements and exceedance reports twice a year. This permit has limits to Opt Out of the Title V Renewable Operating Permit program, by restricting the potential to emit of hazardous air pollutants and complying with the requirements of the NESHAP.

Personal Protective Equipment: Steel toed shoes/boots and safety glasses with side shields

<u>Vapor Degreasing</u>- This is a closed top vapor degreaser that use trichloroethylene. It is equipped with a slow hoist and freeboard refrigeration to control the vapor degreaser air blanket. The practices required by the NESHAP are applied by the operator who has been trained.

<u>Two spray paint booths</u>- One is for top coat (front booth) and the other is for a primer (back booth). Both have overspray control using a dry filter. The spray guns are hand held HVLP technology.

On August 20, 2014, an unannounced scheduled inspection was conducted to evaluate compliance with the conditions of permit to install 326-96. I arrived at approximately 9:53 a.m. and called Mr. Jim Previch from the lobby phone. I left a message on his voice mail that I was there to conduct an Air Quality Inspection. I contacted the Operator to page Mr. Previch. At approximately 9:55 a.m. Mr. Previch came to the lobby so that we could walk to his office to go over the permit requirements. I gave him a brochure and explained that it outlined the procedure to conduct an inspection and I pointed out the link to the survey on the back. I asked if there had been any changes since the last inspection on May 26, 2010.

He told me that in about one month the degreaser will be replaced with a high pressure steam cleaning system and the top coat spray painting will be replaced with powder coating. I gave him a Permit to Install Exemption booklet and pointed out the exemptions that the new equipment would operate under once it was installed. I told him that he would need to request that the permit to install be voided once the degreaser has been replaced and the powder coating system is in operation. I also told him that he would no longer have to report to MAERS since the emissions would be below the reporting thresholds. The back booth for primer coating will remain in operation until all of the wet painted parts are exhausted. I mentioned that since it is not used that much, that it could operate under Rule 287 exemption of less than 200 gallons per month.

I reminded him that he still needed to submit the first half of 2014 exceedance report for the degreaser. He provided the report via fax August 22, 2014, which showed no exceedances.

There have been no changes since the last inspection. Mr. Previch told me that they still have some wet paint for replacement parts on equipment that is already in service.

He gave me a copy of the monthly coating and trichloroethylene usage records that he sends to Advanced Engineering, who perform the emission calculations quarterly.

He told me that the degreaser was cleaned on July 18-20th due to bad pH of the degreasing bath. He said when the pH goes bad they can use stabilizer to help, but it didn't in this case. The result was that the parts were showing signs of rust within hours. He said that it cost approximately \$10,000.00 to replace the 495 gallons of fluid in the degreaser on July 21, 2014 that is only going to be used for only a few months.

He said that Aget conducted an internal environmental audit during the purchase by the new owners. He said the new owners are operating based on a lean manufacturing process and are stocking as little as possible.

I did observe the top coat booth in operation and the degreaser.

Based upon my observations, Aget Manufacturing is operating in compliance with the conditions of permit to install 362-96 and the NESHAP. All of the other processes are operating under a Rule 201 exemption.

I left the facility at approximately 11:15 a.m.

Attachments: Information about Aget and their products, a copy of the usage records for coatings and degreasing agent.

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DATE <u>4-17-2014</u>

SUPERVISOR_