

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

B228935049

|  |                               |                           |
|--|-------------------------------|---------------------------|
| FACILITY: AGET MANUFACTURING CO  |                               | SRN / ID: B2289           |
| LOCATION: 1408 CHURCH ST E, ADRIAN   |                               | DISTRICT: Jackson         |
| CITY: ADRIAN   |                               | COUNTY: LENAWEE           |
| CONTACT: Jim Previch , Plant Superintendent                                      |                               | ACTIVITY DATE: 06/20/2016 |
| STAFF: Michael Gabor   | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR       |
| SUBJECT: Scheduled, announced, inspection of Aget Manufacturing, a minor source. |                               |                           |
| RESOLVED COMPLAINTS:   |                               |                           |

**Scheduled, Announced Inspection of Aget Manufacturing (Minor Source), located at 1408 Church Street, Adrian, Michigan 49221.**

**State Registration Number (SRN): B2289**

### Facility Contacts

**Jim Previch (JP), Plant Manager, 517-263-5781, Ext: 225, [jprevich@agetmfg.com](mailto:jprevich@agetmfg.com)**

### Purpose

On June 20, 2016, Zack Durham, Air Quality Division (AQD) Inspector, and I conducted a scheduled, announced inspection of the Aget Manufacturing (AM) facility located in Adrian, Michigan (Lenawee County) at 1408 Church 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 August 20, 2014.

### Facility Location

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

### Arrival & Facility Contacts

Visible emissions or odors were not observed upon our approach to the facility via Church Street. We arrived at approximately 10:40 am, proceeded to the facility office and dialed staff to request to speak to JP. JP escorted us to inside of the plant. JP confirmed that he received my email (attached) notifying him of the inspection, but he was out of the office. June 20<sup>th</sup> was his first day back to work. I asked to conduct an inspection and suggested he provide us with an overall tour of the facility. JP extended his full cooperation during the inspection and accompanied us during the entire inspection.

### Regulatory Applicability

The facility is now a minor source, but previously operated under Permit to Install (PTI) No. 362-96. The facility removed its coating and degreaser emission units and requested that the PTI be voided on June 1, 2016. It now operates under several PTI exemptions found under the following Michigan Air Pollution Control Rules:

- R 336.1285(r)(iv) (Rule 285(r)(iv)) for metal parts cleaning using high pressure steam, with emissions released into the general in-plant environment;
- Rule 287(d) for one booth enclosed powder coating operations equipped with HEPA filtration / particulate controls and one associated natural gas fired curing oven;
- Rule 287(b) for touch up painting of parts using only hand-held aerosol spray cans;
- Rule 285(i) for the welding of metal parts; and
- Rule 285(l)(i) for the punching and stamping of metal parts;

### Facility Background

AM assembles and coats various dust collectors / baghouses with varying filtration capacities and application. AM purchases fan blades and motors, flat sheet metal, angled iron, and filtration media from other vendors. The sheet metal is form cut, punched, machined / drilled, and then spot-welded to construct the dust collector cabinet. The metal parts are steam cleaned and the final components are powder-coated. Finally assembly occurs after the parts are dried in a natural gas fired furnace. Appropriate filtration media is installed and the final product is packaged for shipment.

### Onsite Inspection Narrative

We proceeded to conduct the site tour. JP first pointed out the area where the sheet metal is cut / machined during the early assembly process. When then observed the R and D area, where product plans and templates are drafted. Next, we observed the metal parts steam cleaning operation. All associated emissions were released into the plant environment. In summary a worker used a wand-equipped steam-generating machine to clean parts. JP pointed out that steam cleaning is slower than their old degreaser but it is healthier, safer, and better for worker health. We then observed the powder-coating paint booth and the associated natural gas fired bake oven. The paint booth was equipped with HEPA filtration that removed paint particles prior to returning the air to the in-plant environment. I did not observe any emissions escaping from the booth, or any signs of emission breakthrough from the filter assembly (no signs of paint particles / dust settling on the floor or walls near the filter's exit point. The powder coating booth appeared to operate satisfactorily and was equipped with appropriate particulate control, per Rule 287(d). Once coated, the parts were heated to 400 degrees Fahrenheit to produce a very durable and shiny finish. A small paint booth remains onsite, but it is used only to touch up parts using aerosol paint cans. JP indicated that less than a gallon of coatings is used per month and more likely about 5 gallons of coating are used annually. We then observed the shipping / packing area of the facility. At that point the inspection concluded.

### Post-Inspection Meeting

I thanked JP for this assistance and cooperation and informed him that I had no compliance concerns. I also apologized to JP for not providing him with a copy of the Michigan Department of Environmental Quality (MDEQ) brochure entitled *Rights and Responsibilities Environmental Regulatory Inspections* at the beginning of the inspection. I went over the brochure with him and asked him to contact me with any questions or concerns. He mentioned that AM's roof still has some signs of "fallout"

that I previously investigated during the fall of 2015. I reiterated that the lab analysis indicated that the "fallout" consisted of biological material and organisms. He continued to allege that it was from Anderson Development. I asked him to contact me immediately if a fallout event occurs again in the future. We departed the facility at approximately 11:05 am.

#### Recordkeeping Review

The PTI exemption rules AM operate under do not require specific records to be kept.

#### Compliance Summary

Based upon the visual observations, AM appears to be in substantial compliance with the applicable PTI exemption rules, under which they operate. Overall, I observed a well-organized and maintained operation.

NAME Michael M. Gler DATE 6/21/16 SUPERVISOR 