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

B248235874		
FACILITY: AP PARTS CO		SRN / ID: B2482
LOCATION: 401 E FIFTH ST, PINCONNING		DISTRICT: Saginaw Bay
CITY: PINCONNING		COUNTY: BAY
CONTACT: Ed Van Horn, Maintenance Manager		ACTIVITY DATE: 08/04/2016
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspec	tion of 4 minor PTIs.	
RESOLVED COMPLAINTS:		

I (glm) performed a scheduled inspection of AP Parts of Pinconning. I met with Mr. Ed Van Horn, Maintenance Manager, and Mr. Paul Kaczmarek, Materials Manager. The facility was originally permitted in the mid-1980's and early 1990's and was named AP Parts. Since then the facility has been bought by DURA and is under the business title Tubular Metal Systems, LLC.

Description

The approximately 225,000 ft² facility, manufactures charge air cooler assemblies, frame assemblies, transmission hubs and structural body system, through assembly and tubular processes. The facility supplies customers such as GM, Ford, Chrysler, Tower Automotive and Nexteer.

PTI #31-96A: Compliant

This permit if for exhaust in the frame rail department. The equipment was not exempted from permitting, because the cutting process shares an exhaust between metal welding, cutting and laser cell. Under current permit exemptions, this permit could be exempted and voided. Besides general conditions, special conditions limit the 6-minute opacity to below 20%. At the time of the inspection the facility was in compliance with all terms of this permit.

PTI 603-93 and 827-85: Compliant

These two permits are for two vats located in the dip parts area. Parts are agitated in soapy water (PTI #603-93) which washes off cutting fluids and processing oils from tubular products, then placed in a vat of clean water. Depending on customer needs some parts are dipped in the rust preventative (RP) tank (827-85). RP parts are then hung to dry before entering the shipping area.

PTI #603-93 was issued as an alkaline based, heated, wash process. This process is not heated. Exempt from permitting under R281. Besides general conditions, special condition 15 requires no visible emissions from this process. At the time of inspection the facility was in compliance with the conditions of this permit.

PTI #827-85 is for the rust preventative tank. The permit requires no visible emissions from this process. Additionally, the applicant shall not substitute any rust preventative for that described in this permit application which would result in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the AQD. I compared the original MSDS for Metkote 203 with the current SDS for Unicoat 617G and they are similar. It does not appear that an appreciable increase occurred. Also, the tanks are not directly vented to exterior air. There is general plant air exchange, but these emission units are not directly vented to ambient air.

PTI #825-85: Compliant

This permit is for two scrubber/exhaust units that service two metalizer units. Steel is rolled on the tube mills and the welded seam is coated with aluminum. A 15 gauge pure aluminum wire is vaporized by means of an oxygen/propylene-fueled metalizer, then sprayed onto the weld area. Over-spray is exhausted to a wet collector and then clean air is exhausted to outside atmosphere. The facility

operates these units approximately 2.5 days a week during one shift. Typically 3 inch and 2.5 inch tubes are used. PM settles to the bottom of the tank and it is cleaned approximately once per month.

The permit limits 6-minute average visible emissions to 20% opacity or less. At the time of the inspection the facility was in compliance with this condition. Also, the permit requires the permittee to operate install and operate scrubbers when the metalizer is in operation. At the time of my inspection the facility was in compliance with this permit condition.

Conclusion

Under current permit exemptions the facility could likely void all permits. They choose to keep the permits active. At the time of the inspection the facility appeared to be in compliance with all conditions of their permits.

NAME Wind R. McCann DATE 8/8/2016 SUPERVISOR C. Have