

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

B639228600

FACILITY: BRONSON PRECISION PRODUCTS		SRN / ID: B6392
LOCATION: 404 UNION ST, BRONSON		DISTRICT: Kalamazoo
CITY: BRONSON		COUNTY: BRANCH
CONTACT: Bridget Mayer, Human Resources Manager		ACTIVITY DATE: 02/18/2015
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance Inspection		
RESOLVED COMPLAINTS:		

An unannounced inspection was conducted at Bronson Precision Products, (BPP) to determine compliance with Air Pollution Control (APC) Rules. Staff met with Bridget Mayer (Human Resources Manager), Bill Fox (Maintenance Supervisor), and Kevin Rayhill (Engineering Manager). The purpose of the inspection was explained and a tour of the facility to observe process equipment was requested.

The plant is basically a large machine shop that produces precision metal parts for the heavy equipment, automotive, and motorcycle industries. There is not any painting being done at this facility.

Machining Operations

The plant consists mostly of many metal working machines to transform steel, mostly bar stock, into parts. There are machines for cutting and sizing stock and other machines for boring, drilling, turning, and grinding, etc. None of the machines produce dry particulates that would require dust collection or outdoor exhaust.

Many of the machines require cutting fluids that require the use of mist eliminators. These are all emitted into the general plant environment. These machining and mist eliminators are considered exempted from permitting under Rule 285(i)(vi)(B).

A few of the machines are equipped with heat treating and quenching section. The heat treating is all electric. The quenching is done in an aqueous solution using Ucon Quenchant A. This process is considered exempted under either Rule 285(i)(iii) or Rule 285(r)(i), depending on whether not there is outdoor exhaust.

Parts Washing, Treating

The company has one washer that uses 7610M cleaner. This product is 10.35% by wt. of VOC (method 24). This is not permit exempt using Rule 281(e), since it is a washer using a VOC containing material with a vapor pressure greater than 0.1 mm Hg. It is also not exempt due to Rule 285(r)(iv) since it is externally vented. Instead, it is exempt using Rule 290 due to its limited emissions and by using a VOC that has a toxicity level (initial threshold screening level) greater than 2.0 micrograms per cubic meter.

They have 3 processes that use L393 parts washer compound and 3 that we use 50R rust preventative compound. The MSDS for both show a 0% VOC. These are permit exempt under Rule 281(e).

Cold Cleaners

There are many cold cleaners scattered about the plant. There are 3 units that use "Orange Peel". This is a water soluble product with a low VOC content of 0.26 lb/gal.

There are about 7 Graymills cold cleaners that use mineral spirits supplied by Briner Oil Co. This is also used in small pots associated with the 11 Acme machines. This is classified as a 100% Stoddard Solvent. There was 1,894 gallons of this product purchased in 2014.

There is 1 Crystal Clean cold cleaner that uses 142 flash mineral spirits. There was 165 gallons of this product purchased in 2014, although it was installed partway through the year.

A portion of these cleaning solvents is not emitted since there is some waste hauled out. Lacking readily available records on the amount returned as waste, it must be assumed that it was all evaporated and emitted. There were over 6 tons of volatile organic compounds (VOC) emissions due to the cleaners during 2014.

Some of the cleaners were found with the lids up and some were found with the lids closed. Company personnel were unaware that the lids must be kept closed when not in use according to Rule 707. The company was provided with some of the "Cold Cleaner Operating Procedures" labels. They will copy and laminate these instructions and post them at each cleaner right away.

Furnaces

The facility has 4 – 400,000 Btu/hour units to heat the building. All are natural gas fired. They are all exempted from permitting under Rule 282(b)(i).

NAME Dale Tursten

DATE Feb, 23, 2015

SUPERVISOR MD 2/23/2015