## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

B662238730

FACILITY: Bimac Inc		SRN / ID: B6622
LOCATION: 345 E Main St, MILAN		DISTRICT: Jackson
CITY: MILAN		COUNTY: MONROE
CONTACT: Charles King , Production Manager		ACTIVITY DATE: 02/22/2017
STAFF: Brian Carley	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Charles "Chuck" A. King, Production Manager

Phone: 734-439-2478

Email: <a href="mailto:cking@optaminerals.com">cking@optaminerals.com</a>

I arrived and met with Chuck King and explained the purpose of my visit. This facility is a mixing and packaging operation, where they take different dry materials (most cases minerals but also includes fly ash) and mix them in the proscribed ratio required by their customer, which is usually the steel production and foundry industry. This mixture is usually used as an additive for the metal melting processes. They can package these mixtures in sizes ranging from 7 lbs to 3,200 lbs containers.

I then asked to see the operation. We went through the facility and they have 7 mixing stations in the facility. They told me that they have 6 baghouses and 6 silos. Each silo has its own particulate control device on top of each one. Based on the information that I had, I determined that the silos are still exempt per Rule 284(2)(k). He said that they change the bags in the baghouses approximately every 9-10 months as needed. They monitor the baghouses performance with magnehelic gauges. They also clean out the bins of the baghouses about every 3-4 weeks.

We then back to the office and I then asked if they were keeping the records to show that they were still exempt from permits per Rule 290. He admitted that he has not been keeping those records like they should. I know from my last inspection that only a few materials had components that had an ITSL which allowed them to meet the requirements of Rule 290 (2)(a)(ii) (A). They do keep track of how much they receive of each material each month, how much they have of each material at the beginning and end of each month, and how much they shipped out as waste from the sweepings and the baghouses and what materials to determine what they cannot account for they will assume went out the stack as emissions. They can show this by doing a mass balance on each of these materials. I asked him to send me an updated spreadsheet for the month of January by the end of the week. I then thanked him for his time and left.

On February 24, 2017, I received an email from Chuck that had an Excel spreadsheet showing that there was 10.28 pounds of materials that have an ITSL or IRSL that they could not account for and therefore assumed that it was emitted into the atmosphere (see attached). I determined that the information on this spreadsheet is acceptable. On March 23, 2017, after reviewing the current ITSL and IRSLs for the materials used, I determined that they were not in compliance with Rule 290 because of their nickel and hexavalent chromium emissions. I called Chuck and arranged and meeting with him on to discuss the issues of no longer being exempt per Rule 290.

On April 18, 2017, I met with Chuck to inform him why they were no longer exempt from per Rule 290. I explained that hexavalent chromium and nickel both have IRSLs that were not greater than or equal to 0.04 micrograms per cubic meter. Since they did not currently have a permit and that they would need to get a consultant to help prepare an application for a permit to install (PTI), I gave them until May 19, 2017 to submit the application. I thanked him for his time and left.

I received a call from Ron Harber, Health and Safety Manager for Opta Minerals, requesting additional time to submit the application due to time constraints by their consultants. He requested to be able to submit by June 23, 2017. I told him that I will be sending them a Notice of Violation and that they will have to submit by that date.

On June 22, 2017, AQD received Opta Minerals' PTI application. Once the PTI is issued, they will be back in compliance.

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SUPERVISOR