

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

B869356425

<b>FACILITY:</b> SPINA ELECTRIC CO		<b>SRN / ID:</b> B8693
<b>LOCATION:</b> 26801 GROESBECK HWY, WARREN		<b>DISTRICT:</b> Warren
<b>CITY:</b> WARREN		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Douglas Ouvry ,		<b>ACTIVITY DATE:</b> 10/23/2020
<b>STAFF:</b> Joe Forth	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> On-site Inspection.		
<b>RESOLVED COMPLAINTS:</b>		

On October 23, 2020, Air Quality Division (AQD) staff Joseph Forth conducted an annual inspection at Spina Electric Co. The facility is located on 26801 Groesbeck Hwy., Warren, MI. The purpose of this inspection was to determine the facility's compliance with Permit to Install (PTI) No. 257-10, the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

I was met by Mr. Douglas Ouvry from the company. I provided my credentials and explained the purpose of the inspection. Mr. Ouvry showed me around the facility and provided requested documents.

Spina assembles and repairs electric motors. The operation hours are 7:00 AM to 5 PM. Spina has a burn-off oven to remove wire coverings so they can be repurposed. A paint booth to coat specific parts for the motors. A part washer and cold cleaner are used to clean greases and oils off various parts. The facility also has various mechanical machining equipment that appear to be exempt from permitting per Rule 285(2)(l)(vi)(B) as all emissions from the equipment are released into the general in-plant environment.

The permit-exempt devices are an aqueous part washer and a 30-gal cold cleaner. Hot water with high pressure is used in the part washer to wash off the oil from the motors; waste water from the washer is taken away by ZEP, a company who provides cleaning products (exempt from permitting per Rule 281(2)(k). The cold cleaner is not subject to MACT standard and exempt from permitting by Rule 281(2)(h) because the air/ vapor interface is less than 10 square feet; and they use DYNA 143, a naphtha solvent in the unit. The cold cleaner appears to be compliant with Rule 707. The solvent is not heated or mechanically agitated and has a Reid Vapor Pressure below 0.3 PSIA. Directions for operation were clearly posted on the equipment.

The facility also has a small paint booth (previously PTI No. 382-81, voided 8/26/2014) that operates under the PTI exemption Rule 287(2)(c). Mr. Ouvry provided records of paint usage dating back to 2017. The highest monthly usage of paint was 24 gallons in July 2020. The booth appeared to be equipped with properly installed dry filters on the exhaust vents. (Usage and Data Sheets provided electronically and can be located in: S:\Air Quality Division\STAFF\Joe Forth\B8693 Spina Electric FY20 Inspection)

**PTI No. 257-10 General Permit for Burn-Off Oven**

**Special Conditions**

**I.1 There shall be no visible emissions from EU-BURNOFF. The oven was not operating at the time of inspection, so emission opacity was not evaluated.**

**II.1 The permittee shall burn only natural gas in EU-BURNOFF. Mr. Ouvry stated that the only fuel fired in EU-BURNOFF is natural gas.**

**II.2 The permittee shall not process any material in EU-BURNOFF other than cured paints, oil or grease on metal parts, racks and/or hangers. Mr. Ouvry stated that the facility only processes cured paints, oil or grease on metal parts in EU-BURNOFF.**

**III.1 The permittee shall not use EU-BURNOFF for the thermal destruction or removal of rubber, plastics, uncured paints, or any other materials containing sulfur or halogens (chlorine, fluorine, bromine, etc.) such as plastisol, polyvinyl chloride (PVC), or Teflon. Mr. Ouvry stated no rubber, plastics, uncured paints, or sulfur or halogen materials are processed in the oven.**

**III.2 The permittee shall not load any transformer cores, which may be contaminated with PCB-containing dielectric fluid, wire or parts coated with lead or rubber, or any waste materials such as paint sludge or waste powder coatings into EU-BURNOFF. Mr. Ouvry stated no transformer cores, lead or rubber coated wires, or waste materials are loaded in EU-BURNOFF.**

**IV.1 The permittee shall not operate EU-BURNOFF unless a secondary chamber or afterburner is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the secondary chamber or afterburner includes maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. The oven is equipped with a secondary chamber. Records reviewed appear to confirm the secondary chamber is kept at a minimum of 1400 degrees F while operating. (See Attached)**

**IV.2 The permittee shall not operate EU-BURNOFF unless an automatic temperature control system for the primary chamber and secondary chamber or afterburner is installed, maintained, and operated in a satisfactory manner. EU-BURNOFF is equipped with an automatic temperature control device for both the primary and secondary chambers.**

**IV.3 The permittee shall not operate EU-BURNOFF unless an interlock system that shuts down the primary chamber burner when the secondary chamber or afterburner is not operating properly, is installed, maintained and operated in a satisfactory manner. Mr. Ouvry claimed that the oven is equipped with an interlock system. Oven information sheet confirms it is equipped with the interlock system (See Attached)**

**IV.4 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to continuously monitor the temperature in the burnoff oven secondary chamber or afterburner and record the temperature at least once every 15 minutes. EU-BURNOFF is equipped with a device to continuously monitor the temperature of the primary and secondary chambers. Most recent calibration certificate was provided (See Attached).**

**VI.1 The permittee shall continuously monitor the temperature in the burnoff oven secondary chamber or afterburner and record the temperature at least once every 15 minutes. EU-BURNOFF is equipped with a device to continuously monitor the temperature of the primary and secondary chambers.**

**VI.2 The permittee shall calibrate the thermocouples associated with the primary and secondary chambers at least once per year. The most recent calibration was performed on October 30, 2019 (at the time of inspection with one year of the last calibration.) (See Attached)**

**VI.3 The permittee shall keep, in a satisfactory manner, temperature data records for the burnoff oven secondary chamber or afterburner. All records shall be kept on file and made available to the Department upon request. The permittee is keeping records of the temperature of both the primary and secondary chambers. (See Attached)**

**VI.4 The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction of the control equipment, any maintenance performed and any testing results for EUBURNOFF. All records shall be kept on file and made available to the Department upon request. EU-BURNOFF has not experienced any malfunctions. No maintenance has been performed on the oven thus far aside from the calibrations of the temp monitors which were provided.**

**VI.5 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (cured coating, oil or grease) processed in EU-BURNOFF, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. All records shall be kept on file and made available to the Department upon request. SDSs for all materials processed in EU-BURNOFF were provided electronically. (See previously mentioned address for digital records.)**

**VI.6 The permittee shall maintain current information from the manufacturer that EU-BURNOFF is equipped with a secondary chamber or afterburner, an automatic temperature control system for the primary chamber and secondary chamber or afterburner, and an interlock system that shuts down the primary chamber burner when the secondary chamber or afterburner is not operating properly. All records shall be kept on file and made available to the Department upon request. The permittee showed and confirmed with documents that the oven is equipped with a secondary chamber, automatic temperature control system for both chambers, an interlock system.**

**VIII.1 The exhaust gases from EU-BURNOFF shall be discharged unobstructed vertically upwards to the ambient air from a stack with an exit point not less than one and one half times the building height (from ground level to point of discharge). Exhaust stacks for EU-BURNOFF appeared to be unobstructed and venting vertically.**

**IX.1 The permittee shall not replace or modify any portion of EU-BURNOFF, including control equipment, unless all of the following conditions are met: (R 336.1201) a) The permittee shall update the general permit by submitting a new Process Information Form (EQP5784) to the Permit Section and District Supervisor, identifying the existing and new equipment a minimum of 10 days before the replacement or modification. b) The permittee shall continue to meet all general permit to install applicability criteria after the replacement or modification is complete. c) The permittee shall keep records of the date and description of the replacement or modification. All records shall be kept on file for a period of at least five years and made available to the Department upon request.**

The permittee has not replaced or modified any portion of EU-BURNOFF.

### Compliance

The permittee appears to be in compliance with Permit to Install (PTI) No. 257-10, the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

NAME *Joseph M. Furt*

DATE 12/28/20

SUPERVISOR *K. Kelly*