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

FACILITY: Cor-Met		SRN / ID: M4275
LOCATION: 12500 E GRAND RIVER, BRIGHTON		DISTRICT: Lansing
CITY: BRIGHTON	· · · · · · · · · · · · · · · · · · ·	COUNTY: LIVINGSTON
CONTACT: Bill Daavettila,		ACTIVITY DATE: 01/29/2014
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Unannounced, sche	duled inspection.	
RESOLVED COMPLAINTS:		

On 1/29/2014; the Air Quality Division (AQD) of the Department of Environmental Quality (DEQ) conducted an unannounced, scheduled inspection of Cor-Met.

**Environmental contact:** 

William Daavettila, 810-227-3251; billd@cor-met.com

Facility description:

This facility produces specialty cored wire, coated welding electrodes, and solid tool steel wires and alloy steel wires, for welding purposes.

### **Regulatory overview:**

This facility operates manufacturing processes which they consider to be exempt from the Rule 201 requirement to obtain an air use permit (permit to install), under Rule 285 of the Michigan Air Pollution Control Rules. Previous inspection reports had described some processes as exempt under Rule 290, but the Rule 285 exemptions are much more straight forward.

Emission units:

Powder mix line, with Torit dust collector: Rule 285(I)(vi)(B)

Flux line, with cyclone and Torit dust collector: Rule 285(I)(vi)(B)

Flux core wire forming lines with dust collectors; Rule 285(I)(i)

Test welding operation and Torit dust collector with HEPA filter; Rule 285(i)

Vertical milling machine: Rule 285(I)(vi)(A) and (B)

Location:

The facility is located in a small industrial area, with businesses to the north and northeast, for the first 1,000 feet, followed by I-96, 1,000 feet further north. To the east is undeveloped land for 4,000 feet, to the west is undeveloped land, for about 1,800 feet, and to the southwest is undeveloped land, for well over one mile. To the south is undeveloped land, for about 4,000 feet. The nearest residences are over 2,000 feet to the north.

## **Recent history:**

Cor-Met started operations in 1972, and moved to this site in 1997. This facility was most recently inspected by AQD's Ken Damrel (now retired), in 2008 and 2010. There are no records of AQD ever having received a complaint of this facility.

### Arrival:

I arrived at 1:07 PM. I could not see any visible emissions from the plant roofline, nor could I detect any odors. Weather conditions were mostly sunny, and 10-15 degrees F, with winds out of the west at 15-20 miles per hour. I met with Mr. William Daavettila (also known as Bill D.), who is the plant manager. I

provided him with a copy of the DEQ brochure "Environmental Inspections: Rights and Responsibilities."

Inspection:

Mr. Daavettila indicated that there have not been any real changes since the last AQD inspection, on 1/21/2010. Business has gradually improved since the lowest point, which was in 2009. They are almost back at the level of business they were doing in 2008. They have 25 employees, almost the number they had prior to the Recession.

They have about 6-8 Torit dust collectors in the plant, all of which exhaust to the inside air. They try to capture dust emissions at the point of generation. There about a dozen lines in the plant, total.

Powder mix line, with Torit dust collector; Rule 285(I)(vi)(B):

The flux they make here is a mixture of metal powder, clay, and sand. The mixer is controlled by a Torit dust collector. In welding, the flux forms a kind of crust, over the metal where the welding is done. There are different kinds of fluxes, depending on what the customers need. This exhausts through a Torit dust collector. By exhausting into the general, in-plant environment, this process can be considered exempt under Rule 285(I)(vi)(B).

Flux line, with cyclone and Torit dust collector; Rule 285(l)(vi)(B):

Electrodes are essentially flux coated metal rods. The rods come out of a press, and the flux is extruded, somewhat like a clay, to coat the rods. A short length of metal at the end of each rod is brushed off. The flux line was not running, at the moment. It is controlled by a cyclone, and a Torit dust collector. Because it exhausts into the general, in-plant environment, this process can be considered exempt under Rule 285(I)(vi)(B).

The electrode rods themselves can be steel, steel with various alloys, or pure nickel, depending on what their customers need. The flux is generally air dried for a day, then baked in an electric oven. The electric ovens are exempt from needing air use permits.

Flux core wire forming lines, with Torit dust collectors; Rule 285(I)(i):

There are a number of lines which use dies to make the flux core wire. The wire starts out as a rolled metal ribbon, and a series of dies gradually bend the ribbon into a U shape. Dry flux powder is applied inside the "U", and additional dies close the opening, encasing the flux inside. Additionally, the wire may be drawn out through more dies, making it longer and thinner. I could not see any dust emissions from these lines. These processes are controlled by Torit dust collectors, and exhaust indoors. The flux core wire lines are considered exempt under Rule 285(l)(i), which allows for bending, forming, or drawing of hot or cold metals. In some occasions, the flux core wire is baked, but mostly, it is spooled up.

Weld test line with Torit dust collector with HEPA filter; Rule 285(i):

They have a small test welding operation, where they test products, for quality. The several welding units there are controlled by a Torit dust collector, which is equipped with a HEPA filter. This exhausts indoors. The welders were not running, at the time of the inspection. Rule 285(i) exempts welders from needing an air use permit.

Vertical milling machine; Rule 285(I)(vi)(A) and (B):

This metal working machine is used on a non-production basis, qualifying for the 285(I)(vi)(A) exemption, and exhausts only into the general, in-plant atmosphere, qualifying for the (B) exemption. It was not running, at the time of the inspection.

I could not see any visible emissions, as we walked through the plant. The facility appeared to be clean and neat. The facility website, <u>www.cor-met.com</u>, provides an overview of the products they manufacture (see attached documents), and includes links to Material Safety Data Sheets for the various alloys they use in their products.

3/4/2014

# Conclusion:

Mr. Daavettila was very knowledgeable and professional. | could not find any instances of noncompliance at the facility, nor any areas where I felt there needed to be improvement. The facility appears to be in compliance with the Michigan Air Pollution Control Rules, at this time.

NAME

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SUPERVISOR Michel Miller