

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

N003745472

FACILITY: FERNCO INC		SRN / ID: N0037
LOCATION: 300 S DAYTON, DAVISON		DISTRICT: Lansing
CITY: DAVISON		COUNTY: GENESEE
CONTACT: Roger Redmond , Corporate Quality and Safety Manager		ACTIVITY DATE: 07/24/2018
STAFF: Samantha Braman	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Unannounced, scheduled inspection to determine compliance with Permit No. 727-79.		
RESOLVED COMPLAINTS:		

**Purpose:** Unannounced, scheduled inspection for compliance with permit No. 727-79.

**Location:** Fernco-Dayton street is in a slight industrial and residential area. The facility is approximately 182 feet from the nearest surface water (Black Creek), 241 feet from the nearest residence, 550 feet from a neighborhood park, 877 feet from an intermediate school and 1,260 feet from an elementary school. (See map attached). The new Fernco facility on Enterprise Dr. is also in a slight industrial and residential area. Closest residence to the facility is 500 feet. (See map attached.)

**Facility Background/Regulatory Overview:** Fernco operates on one shift, five days per week. Their main operations consist of injection molding of plastic couplings and seals. Fernco of Davison is considered a minor source of air emissions. The facility operates under a Permit to Operate for curing oven No. 727-79 issued on 3/6/1985.

A major source has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns. It is also considered a minor area source for Hazardous Air Pollutants (HAPs), because it was not considered to have a PTE of 10 TPY or more for a single HAP, nor to have PTE of 25 TPY or more for combined HAPs.

**Fee Status:** This facility does not belong to a category fee and is not required to report to MAERs.

**Inspection:**

Arrived: 12:55 PM

Departed: 3:00 PM

Weather 75°F, wind SW at <5 MPH

There were no visible emissions from the facility upon arrival. A burnt plastic odor was identified intermittently in front of the complex. Later, minimal visible emissions were identified coming out of curing oven vents into the outside air, which was the source of the burnt plastic odor.

Brad Myott and I were notified by the operator on the guest telephone in the lobby that Roger Redmond, Corporate Quality and Safety Manager, was not housed at this facility, but at the new Enterprise Drive location. Once she was able to reach Roger, he met us at the Dayton Street location to take us on a tour of the facility. We learned that after the construction of the Enterprise Drive location they are approximately 1-2 years out from a complete transition to the new facility. The Dayton Street facility will soon be just office space. Roger showed us around what is left of the plant on Dayton Street. Roger also notified us that he plans on retiring in a few years.

No.	Emission Unit or Flexible Group	Description	Permit Number or Exemption	Comp. Status
1	Curing Oven	Hydraulic curing oven has been decommissioned.	727-79	N/A
2	Curing Ovens 2017 & 2018	Two curing ovens uses liquid plastisol to mold various sized pipe couplings.	Exempt 286(b)	C
3	Vertical Injectors	Two Magna 280 vertical injectors.	Exempt 286(b)	C

4	Horizontal Injectors	18 horizontal injectors housed at the Enterprise Dr. location	Exempt 286(b)	
5	Storage Silos	One out of four silos in use at Dayton Street location. Four 78,000 lb silos in use at Enterprise location.	Exempt 286(b)	C

**EU 1 & 2:** The old curing oven that is covered under Permit No. 727-79 has since been decommissioned. Permit for this curing oven can be voided. They now utilize two new curing ovens, installed in 2017 and 2018. Liquid PVC (plastisol) is poured into open molds of varying sizes for specialty orders only. The ovens only put out about 250-300 pieces in a day, which is about ¼ of the plastisol they used to use. Ovens are operated at 360°. These ovens appear to be exempt under 286(b).

**EU 3 & 4:** There are two electric vertical injectors. These are currently at the Dayton facility, and were not up and running yet. Will operating at the Dayton facility for a couple years, and then will be transferred to the new location on Enterprise Drive in a year or two. These two injectors are to replace the four smaller injectors which will be scrapped once the two are up and running. At the Enterprise location there are currently 18 horizontal injectors in use. They all use PVC pellets. This equipment is exempt under 286(b).

**EU 5:** Three of the four storage silos at the Dayton Street location are no longer being used. There are four 78,000 lb. silos in use at the Enterprise Dr. location which are used to store the PVC pellets.

**Recordkeeping:** There are no recordkeeping requirements associated with this permit. Roger gave us the SDS for the Plastisol, as well as the purchase orders.

**Concerns Noted:**

1. A. Ovens should try to be operated 20-30 degrees lower to help mitigate visible emissions (VE) and odors.  
 B. When curing ovens are transferred to Enterprise Drive facility, it is recommended that Fernco put in some sort filter or other control device to capture any smoke being released out of the curing oven vents to mitigate VE and odors.
2. Permit for decommissioned curing oven can be voided.

**Previous Inspections:**

3/27/2003 – KMT, no concerns noted

**Previous Violations:**

None found on record.

**Previous Complaints (within 2 years):**

None found on record.

**Summary:** Facility appeared to be in compliance with their permit and all applicable state air regulations. No violations were noted during this inspection.

NAME Sarah K. Brown DATE 8-6-18 SUPERVISOR B. M.