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

FACILITY: CONTROLLED POWER CO		SRN / ID: N1927
LOCATION: 1955 STEPHENSON HWY, TROY		DISTRICT: Southeast Michigan
CITY: TROY		COUNTY: OAKLAND
CONTACT: Michael Tazzia, Maintenance Manager		ACTIVITY DATE: 04/17/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced Lev	el 2 Target Inspection	
<b>RESOLVED COMPLAINTS:</b>		

On April 17, 2015, I conducted an unannounced level 2 target inspection at Controlled Power Company. The facility is located at 1955 Stephenson Highway, Troy, Michigan 48083. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules, and the facility's Permit to Install No. 465-88. During the pre-inspection meeting, I initially showed my credential (ID Badge), stated the purpose of my visit, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities" to Mr. Michael Tazzia, Maintenance Manager and facility contact. Mr. Mark Hunt, former facility contact, joined us during the pre-inspection meeting to discuss recordkeeping and other relevant Air Quality issues pertaining to plant operations.

The facility manufactures uninterrupted power supply (UPS), rectifiers, transformers, inverters, emergency lighting, distribution centers for computers, and power purifiers. The facility builds the casings and the components; assembles the components in the casings to build the desired units; and tests the individual units prior to storage and shipment to customers.

During the pre-inspection meeting, I discussed with Mr. Tazzia and Mr. Hunt the adhesive/coating use records I received per my 12/05/14 facility visit. For 2012 - 2014 adhesive usage data, the clear varnish usage was highest on 2012 at 495 gallons and averaged at 1.9 gallons per day based on 5 days per week of operation. The resin varnish usage was highest in 2012 and 2013 at 385 gallons and calculated to 1.48 gallons per day based on 5 days per week of operation. Both equipment/emission units met the AQD Rule 287(a) permit to install exemption. I also discussed options for the facility to revise PTI No. 465-88 and include all air quality related emission units into a single permit to install with enforceable HAPs restrictions if the facility will request for a VOC emission limit of greater than 10 tons per year or obtain a synthetic minor permit with VOC restriction of less than 10 tons per year.

During the 12/05/14 visit, I observed the facility operated 2 powder coating booths exempt from permit to install per AQD rule 287(d). The filters were in place and appeared to be operating properly. A wet spraybooth, under Permit to Install (PTI) No. 465-88, appeared to be unused but with filters in place. Mr. Hunt mentioned that this booth had not been used for 9 years. The facility operated a fully enclosed adhesive dip tank, known as the varnish tank near the powder coating process area. I observed 3 ovens to dry washed parts prior to powder coating process and after powder coating process, etc. In the transformer area, I observed another pressure adhesive coating tank, known as vacuum impregnator/resin varnish tank. During the 4/17/2015 facility walk through, I observed metal fabrication activities such as cutting, routing, drilling, machining, surface grinding, buffing, and sanding. I observed small forming presses. The machining operations were exempt from permit to install requirements per AQD Administrative Rule R 336.1285(I)(vi). I observed welding equipment that were exempt from permit to install requirements per AQD Administrative Rule R 336.1285(i)(vi). The wet spraybooth was not in use but has filters in place. The 2 powder booths have filters in place. The lid to the adhesive dip tank was closed. In the transformer area, I observed employees winding the wires for the transformer manufacturing. The vacuum impregnator tank was sealed. I observed a small parts washer (18" x 24") with safety instructions posted and the lid was closed during inspection.

Outside the building, I observed a diesel fired Cummins generator. I observed 1135 Hp at 1800 rpm and 940 Hp at 1500 rpm. The plate showed May 1999 as manufacture date. The generator appeared to be subject to 40 CFR Part 63 Subpart ZZZZ as an area source reciprocating internal combustion engine (RICE). Since AQD does not have delegation of authority from USEPA to enforce this standard, I am deferring compliance determination to USEPA. It appears that this engine is exempt from permit to install requirements per AQD Rule 285(g) but I asked Mr. Tazzia to contact the manufacturer and obtain the engine's rated heat input to ensure that it is below the 10,000,000 BTU/hr. exemption limit. Otherwise, the engine may require a permit to install from AQD.

Currently, the facility appeared to be in compliance with AQD regulations during inspection.

NAME\_\_\_\_\_\_

DATE 4/23/2015 SUPERVISOR