

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

N192761219

FACILITY: CONTROLLED POWER CO		SRN / ID: N1927
LOCATION: 1955 STEPHENSON HWY, TROY		DISTRICT: Warren
CITY: TROY		COUNTY: OAKLAND
CONTACT: Michael Tazzia , Maintenance Manager		ACTIVITY DATE: 12/08/2021
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site Inspection		
RESOLVED COMPLAINTS:		

On December 8, 2021, I conducted an on-site inspection at Controlled Power Company. The facility is located at 1955 Stephenson Highway, Troy, Michigan. 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 (PTI) No. 465-88 and PTI No. 129-15. During the pre-inspection meeting, I initially showed my credential (ID Badge) and stated the purpose of my visit to Mr. Michael Tazzia, Maintenance Manager and facility contact.

To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. I adhered to the facility's COVID-19 safety protocols such as temperature check at main building entrance reception area and wearing of face mask while conducting the inspection. Following AQD guidance, all recordkeeping information were obtained through email instead of obtaining printed copies during inspection including some monitoring data except for data that needed to be verified during the walk-through inspection such as checking for hour meter data.

The facility manufactures uninterrupted power supply (UPS), power conditioning equipment, rectifiers, transformers, emergency lighting, inverters, computer distribution centers, power purifiers, and DC power supplies. The facility manufactures the casings and the components in-house; assembles the components into the casings to build the desired units; and tests the individual units prior to storage and shipment to customers.

The facility operates under AQD PTI No. 465-88, covering 3 spraybooths, and PTI No. 129-15, covering an emergency generator (EUENGINE1) and FGFACILITY. FGFACILITY contained single and aggregate Hazardous Air Pollutant/s (HAPs) emission limits to opt the facility out of Clean Air Act of 1990, Title V, Renewable Operating Permit program requirements.

During the walk-through inspection, Mr. Tazzia took me towards the transformer area where I observed the pressure adhesive coating tank, known as vacuum impregnator/resin varnish tank. Since the tank is a

pressure vessel dip coating process, I observed the vacuum impregnator tank's cover was closed and sealed tight . Since this equipment utilizes adhesive coating, the facility uses AQD Rule 287(2)(a) as exemption from permit to install requirements. The facility submitted records showing 12 lb./month resin varnish usage. Based on submitted usage records and 11.5 lb./gallon reported density, its adhesive usage is less than 2 gallons per month and meets Rule 287(2)(a) exemption.

Next, we looked at the fully enclosed coating dip tank, known as the varnish tank, near the powder coating process area. The facility is claiming AQD Rule 287(2)(c) from permit to install requirements for this varnish tank. The submitted records showed that the highest clear baking varnish usage occurred in August 2021 at 110 gallons. This is less than the 200 gallons/month limit under AQD Rule 287(2)(c) for permit to install exemption.

Next, we walked towards the rear of the building where I observed the facility operating 2 powder coating booths. These booths were originally covered under PTI No. 465-88. The facility converted the booths for powder coating processes and now may be exempt from permit to install requirements per AQD Rule 287(2)(d). The booths have dry filters, and I did not observe gaps in between filters. The third booth, covered by PTI No. 465-88, appeared to be unused and utilized as a storage space. I observed 2 ovens used for drying washed parts prior to powder coating process and for baking powder coated parts.

During the facility walk-through inspection, I also observed metal fabrication activities such as cutting, routing, drilling, machining, surface grinding, buffing, and sanding. The machining operations are exempt from permit to install requirements per AQD Administrative Rule R 336.1285(2)(l) (vi). I observed welding equipment exempt from permit to install requirements per AQD Administrative Rule R 336.1285(2)(i). In the transformer area, I observed employees winding the wires for the transformer manufacturing.

I observed a small parts washer (18" x 24"), with safety instructions posted and the lid was closed during inspection. The parts washer (cold cleaner) has air/vapor interface of less than 10 square feet and exempt from permit to install requirements per AQD Rule 281(2)(h). The facility is using non-halogenated solvent, Polystrip, as parts washer. Per submitted data, the components of Polystrip is mostly alcohol and no IRSL values. I verified that this equipment can also use AQD Rule 290 permit to install exemption with 1,000 lb./month emission limit. Submitted records showed 205 lb. highest emission rate for the month of September 2021 in FY2021 with total VOC emissions reported at 1,560 lb. or 0.78 ton per year.

PTI No. 129-15 was issued to the company for the 1135 horsepower diesel fired engine manufactured in 1999. As discussed above, the PTI also

consolidate all air quality related hazardous air pollutant (HAP) emissions at the facility as a synthetic minor or opt-out facility by including enforceable individual HAP and aggregate HAPs restrictions of less than 9.0 tons and 22.5 tons per year respectively. Per PTI No. 129-15 Special Condition FG-FACILITY (I.1), the facility submitted records showing the highest emitting individual HAP for FY 2021, is Xylene. The highest monthly 12-month rolling total Xylene emission for FY 2021 was emitted in August 2021 at 1476 lb./12 months or 0.738 ton/12 months and less than the 9.0 tons permit limit. The highest monthly 12-month rolling total aggregate HAPs emission was 2798 lb./12 months or 1.399 tons/12 months and less than the 25 tons permit limit.

The generator covered by PTI No. 129-15 is located outside the building adjacent to the assembly and product testing area. During walk-through inspection, I observed the diesel fired Cummins generator with name plate showing 1135 Hp at 1800 rpm and 940 Hp at 1500 rpm, as required by PTI No. 129-15 Special Condition EUEENGINE1 (IV.2). The plate also showed May 1999 as manufacture date. Per PTI No. 129-15 Special Condition EUEENGINE1 (IV.1), the facility has a non-resettable hour meter and I observed 3460.3 operating hours. Per PTI No. 129-15 Special Condition EUEENGINE1 (III.1), the monthly 12-month rolling total hours of operation in November 2021, showed 83.4 hours. The highest FY 2021 monthly 12-month rolling total hours of operation occurred in January 2021 at 179.9 hours and less than the 500 hours/year permit limit. Mr. Tazzia informed me that the generator did not operate in September and October 2021. Per PTI No. 129-15 Special Condition EUEENGINE1 (II.1), the facility submitted documentation showing the diesel fuel used has a Sulfur content of 15 ppm and cetane index of 40. Per PTI No. 129-15 Special Condition EUEENGINE1 (IX.1), the facility conducts yearly engine maintenance that included tune-ups, oil and filter change, inspection of hoses, belts, fittings, leaks, etc. The FY 2021 maintenance was conducted November 1, 2021.

I did not observe any noncompliance issues during inspection.

NAME

[Handwritten Signature]

DATE 01/13/2022

SUPERVISOR

[Handwritten Signature]