

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N203540754

FACILITY: Airgas USA, LLC		SRN / ID: N2035
LOCATION: 1290 COMBERMERE ST, TROY		DISTRICT: Southeast Michigan
CITY: TROY		COUNTY: OAKLAND
CONTACT: Michael Paul, Area Operations Manager		ACTIVITY DATE: 06/29/2017
STAFF: Robert Joseph	COMPLIANCE STATUS: Unknown	SOURCE CLASS: MINOR
SUBJECT: A visit was scheduled at the request of the facility with Area Operations Manager Michael Paul to verify that both previously permitted emission units (HCl/Caustic Scrubber PTI 23-89 and H ₂ S/Activated Carbon Scrubber PTI 724-92) are no longer in-service and can be voided.		
RESOLVED COMPLAINTS:		

On Thursday June 29, 2017, Michigan Department of Environmental Quality-Air Quality Division staff Robert Joseph and Sam Liveson conducted a self-initiated inspection of Airgas USA, LLC. located at 1290 Combermere St, Troy, Michigan. The purpose of the inspection was to verify the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmentally Quality-Air Quality Division (MDEQ-AQD) Administrative Rules and conditions of Permit to Install (PTI) No. 23-89 and 724-92. The permits were originally issued to Scott Specialty Gases, Inc. The facility began operations at this location after changing the company name from Scott Specialty Gases, Inc. to Airgas USA, LLC. after merging with the Royal Oak facility. The facility requested to void both permits because they are now out of service.

We arrived at the facility at 9:30am and we met with Michael Paul the Area Operations Manager. We introduced ourselves and stated the purpose of our inspection to Michael and he accompanied us into the facility. We visited the area where the HCl Scrubber (PTI 23-89) and H₂S/Activated Carbon Scrubber (PTI 724-92) were located. We verified that both emission units are no longer on site. Michael indicated both units were removed last year by Clean Harbors, an independent contractor.

Airgas USA, LLC. now operates as a gas producer of specialty gases including Argon and Helium which are stored in cylinders. The storage of these gases is exempt under Rule 284 (2)(j) which states the following;

R 336.1284 Permit to install exemptions; containers.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to containers, reservoirs, or tanks used exclusively for any of the following:

(j) Pressurized storage of acetylene, hydrogen, oxygen, nitrogen, helium, and other substances, excluding chlorine and anhydrous ammonia in a quantity of more than 500 gallons, that have a boiling point of 0 degrees Celsius or lower.

Two (2) electric ovens were also observed and are used to burn and dry moisture from all returned cylinders. These ovens emit within the facility and do not appear to be an air quality concern.

We also observed a paint booth in the facility which Michael indicated has not been used since the facility began operations. He indicated that no spray coating will occur and that all coatings on the cylinders will be performed by roll-on application. The paint booth may be exempt under Rule 287 (2) (c) which states the following;

R 336.1287 Permit to install exemptions; surface coating equipment.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the

following:

- (c) A surface coating line if all of the following conditions are met:
- (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
 - (ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.
 - (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

The filters are removed from the facility and disposed of from an outside source. This completed our review of the facility and we told Michael that if additional information was needed we would contact him.

Conclusion

Both the HCl Scrubber and Activated Carbon Scrubber emission units have been removed from on-site and at the request of the facility can now be voided. Sam Liveson emailed Sue Thelen requesting that both permits be voided. The electric ovens do not appear to be air quality concern, and both the gas storage containers and paint booths are exempt from requiring a permit to install. The facility will be required to keep record data for paint usage and filter replacement in-order to comply with exemption status. Michael indicated the facility may install another paint booth and it may be exempt if Rule 287 (2)(c) requirements are met.

NAME Robert Joseph

DATE 07/19/17

SUPERVISOR SK