

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

N325426454

FACILITY: MAC VALVES INC		SRN / ID: N3254
LOCATION: 30569 BECK ROAD, WIXOM		DISTRICT: Southeast Michigan
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Dave Meinke, Facility Engineer		ACTIVITY DATE: 08/14/2014
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On August 14, 2014, I conducted a scheduled inspection of Mac Valves located at 30569 Beck Road, Wixom, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of Air Use Permit to Install (PTI) No. 130-94, PTI No. 230-95; and R 336.1208a registration.

I entered the building, presented photo identification and explained the purpose of the inspection to Mr. Dave Meinke, Facility Engineer; and Ms. Amy Brown, Facility Engineer. Ms. Brown and Mr. Meinke escorted me during the facility inspection and provided records.

PTI No. 130-94

Special Condition (SC) no. 15, I reviewed documents, which appeared to demonstrate that VOC emissions have not exceeded 12.5 pounds per hour nor 43.0 tons per year. Copies of monthly emission records and 12-Month Rolling Average VOC Calculation sheet are attached. Mac Valves' May 2014 12-month rolling emissions records indicate the VOC emissions were 3.56 tons. The emission records appear to indicate compliance with this condition.

SC no. 17, AQD has determined this source appears to be in compliance; visible emissions were not detected during the inspection.

SC no. 18, The Air Quality Division has not requested the source perform emissions testing.

SC no. 19.A,1, AQD has determined this source appears to be in compliance; monthly records of each coating used were recorded. Due to the nature of end use product requirements, this source only uses "extreme performance coatings".

SC no. 19.A,2, VOC content records were presented (see attached). Coatings are applied as they are received. No reducers or solvents are added.

SC no. 19.A,3, VOC content records were presented (see attached). Coatings are applied as received. No reducers or solvents are added.

SC no. 19.A,4, AQD has determined this source appears to be in compliance with the requirement of keeping monthly records of gallons of coating used as applied.

SC no. 19.A,5, AQD has determined this source appears to be in compliance; no reducers are used. All finishes are water-based and do not require reduction as supplied from the

manufacturer.

SC no. 19.B, AQD has determined this source appears to be in compliance; see attached 12 month rolling total record from permittee.

SC no. 19.C, Mac Valves uses only water-based surface coatings; no VOC solvents are used for purging. Their water-based coating equipment is purged with water. The water used to flush the coating lines is collected in drums and shipped as a nonhazardous waste.

SC no. 20, I observed spray booths 1 and 2. Both booths use a single layer blanket filter, which is held in place by air pressure and the adhesive property of overspray. The blanket filters in booths 1 and 2 are changed two times per shift. The manual spray booth blanket filter is changed once per each shift. I could not touch the blanket filters because the paint line was operating. I did discuss my observation that appeared to indicate the placement of the blanket filter in booth 2 might allow for some overspray to bypass the control device. My concern was quickly addressed by repositioning the fabric filter and adding a retainer where the filter meets the floor.

SC no. 21, Exhaust stacks were evaluated during this inspection and appeared to meet the permitted dimension requirements.

PTI No. 230-95

SC no. 15, I received a copy of the chlorination log records (see attached). I reviewed the chlorine emission records from January 2012, through July 2014. The twelve-month rolling records indicate a peak 12-month emission of 0.36 tons, which is less than 0.52 ton permit limit.

SC no. 16, The Air Quality Division has not requested the source perform emissions testing.

SC no. 17, the exhaust stack was evaluated during this inspection. Mr. Meinke and I climbed onto the roof and observed the stack for this process appeared to have been damaged by recent severe storms (a similar observation was made during my May 12, 2010, inspection). A stack section was lying on the flat roof but the bottom portion of the stack remained attached. Mr. Meinke stated that a repair purchase order was pending signature. I estimated the height of the building and the height of the remaining stack, which, in total, appeared to be in compliance with the minimum stack height requirement of 36 feet.

208A REGISTRATION

Mac Valves has maintained 208a registration via timely submittals and recordkeeping. A letter was sent by the AQD notifying Mac Valves that Rule 208a was being rescinded. Mac Valves will be submitting a permit modification application in order to maintain compliance.

R 336.1281(e) Applicability

During the stack inspection on the roof, we observed a square exhaust stack that vents a parts washing machine. This process appears to be exempt from the requirement to obtain an approved air use permit to install per R 336.1201 per R 336.1281(e). The parts washing machine is used to prepare metal parts for surface coating and assembly. The parts themselves cannot become an air contaminant because they are solid metal. A review of the cleaning solution's chemical components appears to indicate that none of the VOCs have a vapor pressure greater than 0.1 millimeter of mercury at standard conditions. Therefore, it appears that this process is exempt from R 336.1201 per R 336.1281(e).

CONCLUSION

The AQD has determined this source appears to be in compliance with the evaluated requirements of Permit to Install (PTI) No. 130-94, PTI 230-95, R290 and 208a registration.

NAME *Robert Elamula*

DATE *8/18/14*

SUPERVISOR *CJE*