

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

N552144153

FACILITY: NORTHERN PRECISION PRODUCTS, INC.		SRN / ID: N5521
LOCATION: 4790 N MACKINAW TRL, LEROY		DISTRICT: Cadillac
CITY: LEROY		COUNTY: OSCEOLA
CONTACT: Brian Ringler , Maintenance Manager		ACTIVITY DATE: 04/12/2018
STAFF: Rob Dickman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Schedule inspection of this minor source		
RESOLVED COMPLAINTS:		

Performed an inspection at this minor source of emissions. The applicable air permit for the facility is Permit to Install number 119-95A, issued in September of 1998. This facility fabricates metal fittings (mostly brass) from virgin stock. Fittings are manufactured using various cutting machines. Finished fittings are washed in hot water parts washers.

The permitted equipment and status of each piece is listed below:

- Two Rotary Drum solvent based cold cleaners. Records indicate these were removed probably sometime between 2004 and 2007. These have been replaced by hot water washers.
- One dip tank solvent based cold cleaner. Records indicate this was removed somewhere between 2002 and 2004
- A solvent reclaim distiller appears to have never been installed.
- The cutting fluid used in the various metal milling machines at the facility was at one time solvent based. They have since gone to an aqueous based system.
- A wastewater evaporator is still in use at the facility.

The facility is limited to use no more than 7376 gallons of solvent per year based on a 12-month rolling time period as determined at the end of each month. Records from the facility indicate 600 gallons were used at the facility in the last 12 months and 660 gallons of spent solvent were sent to a disposal facility.

The primary use of solvent is by two solvent based parts cleaners, one stationary and one mobile that are used at the facility. These are small (<70-gallon capacity) and release to the in-plant air when in use. These appeared in good repair and are closed when not in use. A review of records indicated that water additive to make the cutting fluids used by the machines in the plant contains 3% VOC by weight. This is prior to being diluted by water.

VOC emissions from this facility are not to exceed 9.9 pounds per hour nor 24.7 tons per year. With the removal of most permitted equipment and the switch from solvent based cutting fluids and parts washers, VOC emissions are minimal. As described above, the only solvent-based equipment at the facility are two cold cleaners that are enclosed when not in use. Specific VOC emissions calculations are part of the recordkeeping associated with the wastewater evaporator.

A number of records associated with the wastewater evaporator are required to be kept including VOC emissions calculations. These records have not been kept since approximately 2014. The intent of this condition was to account for VOC lost in the evaporation process and by the parts washing equipment. However, since the facility has moved to aqueous based cutting and washing fluids, little to no VOC is emitted.

Operation of the facility is limited to 16 hours per day and 4992 hours per year based on a 12-month rolling time period. In the last 12 months, the facility has operated mostly one shift and had a total number of operating hours of 3650 hours.

The AQD can require testing to determine VOC emissions. No testing has been requested and none is recommended at this time. There are stack parameters for the manufacturing area and for the wastewater evaporator. Again, these were established prior to the facility removing solvent-based equipment and washers. However, these stacks exist at the facility, appear compliant, and do not appear to have been recently modified.

**While the facility has greatly decreased their potential to emit VOCs, possibly so much so that the permit could be voided, some of the permit conditions are still applicable. Submission of the violation notice to the facility is recommended for failing to keep required process and emissions records associated with the wastewater evaporator.**

NAME 

DATE 4/19/19

SUPERVISOR 