

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

N648738682

FACILITY: EAST JORDAN IRON WORKS INC		SRN / ID: N6487
LOCATION: 5000 AIRPORT DR, EAST JORDAN		DISTRICT: Cadillac
CITY: EAST JORDAN		COUNTY: CHARLEVOIX
CONTACT:		ACTIVITY DATE: 02/16/2017
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT:		
RESOLVED COMPLAINTS:		

**Compliance Inspection
N6487 EJ Water Products
PTI 1031-89B (paint booth)
2/16/2017**

I conducted an inspection of EJ Water Products to determine compliance with the Air Pollution Control Rules. EJ Water Products is a manufacturer of fire hydrants and water supply system valves. AQD records identified the SRN N6487 as belonging to this facility but there were no records of permits associated with this SRN in MACES or the Company file.

I met with Mr. Eric Hoogerhyde, Facility Mgr. and Mr. Tony Pitts, Environmental Services Manager for East Jordan Iron Works and EJ Water Products. Mr. Hoogerhyde provided information regarding the products made at this plant and also showed us around the plant. According to Mr. Hoogerhyde, this plant was built in 1998 and was formerly known as EJ Hydrant and Valve. The plant consists of an office area up front and one large rectangular building housing all of the manufacturing processes.

EJ Water Products utilizes pre-cast housings that are purchased from a vendor, to manufacture the hydrants and valves. The processes on-site include; machining, turning, and drilling, assembly, and painting. There is also a small maintenance shop. All processes at the facility are vented to the general in-plant environment with the exception of one water wash paint booth.

Castings and components are machined in-house to prepare them for assembly. There is one assembly line that ends at the paint booth. The paint booth is not a traditional booth enclosure but consists of two exhaust hoods, one beneath and one above the assembly line that captures overspray and directs it to the water wash booth which is vented through the ceiling. The exhaust hoods were drawing air well and were equipped with filters that were in good condition. Paint is mixed in small batches from gallon sized containers that are stored in flammable materials cabinets nearby.

Paint usage is tracked using an estimation based on the number of hydrants produced daily. Emissions calculations are generated monthly using the highest VOC content coating for all production which includes hydrants with castings that came pre-painted. This method generates a more conservative paint usage and emissions estimate, though less accurate, than measuring actual usage of each paint each day.

Following our inspection of the plant processes, Mr. Pitts showed me the recordkeeping system they use to generate the VOC emission calculations. The hydrant production is logged into the database daily and reporting software uses this data to generate a usage and emissions report each month (examples attached). The records I reviewed indicate that paint usage varies but is below the 200 lbs/month limit in the Rule 287 exemption. Emissions calculations indicate that VOC emissions also vary but are less than 500 lbs/month.

The plant records indicate that there is an applicable Permit to Install (1031-89B) with emission limits of 3.15 lbs/hr., 2,000 lbs/month, and 3.25 tons per year. Actual emissions would meet these limits.

Following the inspection I checked for PTI 1031-89B and found that three permits were still active 1031-89, 1031-89A and 1031-89B. An electronic version is available for 1031-89B but not for the other PTI's. District files in Cadillac and Gaylord (East Jordan Iron Works A0767) do not contain copies of any of the permits. 1031-89 was originally issued to A0767 for a paint booth; 1031-89A appears to have been issued for relocation of the paint booth though the new location is not specified. 1031-89B is for an increase in

the allowable usage of VOC coatings and includes the emission limits identified above. The Evalform for this PTI discusses the potential for operation of the paint booth under a Rule 287 exemption but the permittee and the AQD agreed a PTI should be issued due to the potential for increases in paint usage. All three PTI's were issued to East Jordan Iron Works and should be transferred to EJ Water Products via Rule 219 Change of Ownership Request.

As a result of the inspection it appears EJ Water Products is operating the permitted equipment in accordance with PTI 1031-98B and the Air Pollution Control rules and is maintaining records sufficient to document compliance. The PTI's should be transferred from East Jordan Iron Works Inc. (A0767) to EJ Water Products (N6487).

NAME



DATE

2-26-17

SUPERVISOR

