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

N668543075

FACILITY: RENEW VALVE & MACHINE		SRN / ID: N6685
LOCATION: 845 MONROE, CARLETON		DISTRICT: Jackson
CITY: CARLETON		COUNTY: MONROE
CONTACT: Doug Tomkinson, Shop Supervisor		ACTIVITY DATE: 01/18/2018
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Conducted complete scheduled compliance inspection at Minor Source. Facility has no Air Use Permits, some exempt equipment.		
RESOLVED COMPLAINTS:		

On the morning of January 18, 2018, I conducted a complete scheduled compliance inspection, announced a short time prior, of the Renew Valve & Machine Company, Division of Phoenix Partners L.L.C., Carleton, Monroe County (hereinafter Renew). The purpose of the inspection was to determine the Facility compliance status with applicable federal and state air pollution control regulations, in particular, the Act 451, Part 55, Air Pollution Control Act and the administrative rules.

The prior inspection was conducted on April 7, 2010. Prior to that the Air Quality Division (AQD) file history indicates a complaint was received in 1995 related to ventilation from a coating spray booth operating at the facility. The company corrected the stack to an appropriate height with vertical exhaust. The booth was determined to qualify for permit exemption pursuant to Rule 287(2)(b). To my knowledge there has not been any further complaints to date. This facility does not hold any AQD permits and all the operations appear to be exempt from the permitting process.

Upon my arrival to the site I did not observe any noticeable emissions or odor. Upon entering the facility I provided my identification and stated the purpose of the inspection. I met with Doug Tomkinson, Shop Supervisor; he is the current responsible contact person. Tim Rorick was the prior contact at the time of the previous inspection.

I conducted a pre-inspection interview with Doug. Renew still takes in various sizes and types of industrial valves and repairs or reconditions them. That involves cleaning, grinding, turning, blasting, welding and replacing parts. They do have a large walk-in paint booth where they paint some of the valves with aerosol spray cans. I observed the booth was not operational during the inspection. I observed all paint spray cans are stored within the room and includes an aerosol can puncturing/disposal drum. The booth has a narrow ledge around at least 3 sides for setting parts to paint, and paper/cardboard like material on walls for overspray. There is only one exhaust point, an approximately 2 x 2 square in the ceiling. There was no filter in it and I advised Doug of this requirement. He indicated they do normally use one and he would correct this. It doesn't appear likely that particulate spray material would easily exit this small ventilation opening. The process appears to qualify for the Rule 287(2)(b) exemption.

Doug informed me that they have not changed operations much since the previous inspection. Renew employs approximately 30 people. They operate Monday to Friday 8 am -4:30 pm and occasional/as needed on weekends. I inquired whether there was an emergency generator on site and Doug said they have one very small gasoline portable unit. I explained almost all are subject to a federal standard pursuant to 40 CFR 63, Subpart ZZZZ (RICE MACT), however there is a portable exemption. I verified the small generator was on wheels and was stored in a dark corner behind some shelving.

During the inspection we walked through and outside around the two buildings on the property. Overall housekeeping was acceptable, similar to other machine shops and no immediate concerns were identified.

Act 451, Part 55, Part 2 administrative rules contains the Rule 201 requirement to obtain an Air Use Permit to Install and allows for numerous exemptions from this requirement contained in Rules 278 through Rule 291. In addition to the Spray booth described above I observed the following exempt process equipment installed and operating at the facility:

1. Four cold cleaners (parts washers) used in the valve maintenance operations. Two Zep Units, 100 gallons; One medium unit 75 gallons and one small unit 20 gallons. Appear to qualify for exemption Rule 281(2)(h) or Rule 285(r).
2. One enclosed caustic parts washer, heated to 180 degrees F. Appears to qualify for Rule 285(l)(iii).
3. Welding area with exhaust stack and a portable smog hog. Appears to qualify for exemption Rule 285 (lower case l).
4. Numerous metal parts machining operations in-plant and many ducted to a baghouse collector outside. Appear to qualify for exemption Rule 285 (vi)(B) and (C).

I provided Doug with the recently revised Permit to Install Exemption Booklet. Act 451, Administrative Rules under Part 6 and Part 7, there are rules that pertain to existing/new cold cleaners and this was briefly explained and I provided him with orange stickers referencing the requirements to be placed on the Units.

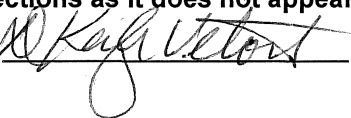
I explained the particulate baghouse collector needs to be installed, operated, and maintained properly to qualify for exemption and the collected materials must be disposed of properly without entrainment into the outdoor air. I requested information on their Waste hauler(s) and Doug said he would find out from person that handles that. I said I will send him a follow up email and will include some AQD other regulatory guidance documents.

#### COMPLIANCE SUMMARY

AQD sent an email to Doug on 1/22 and received a reply on 1/23. Renew's waste hauler for all materials is ERG Environmental.

Renew Valve & Machine appears to be in substantial compliance with the identified applicable state air pollution control regulations at this time. Renew's overall condition and housekeeping was acceptable. This is a true minor source with only exempt equipment. I do not recommend frequent inspections as it does not appear necessary at this time.

NAME



DATE

1/23/18

SUPERVISOR

