

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

P080566840

FACILITY: Precise Finishing Systems, Inc.		SRN / ID: P0805
LOCATION: 1650 N. Burkhart Rd., HOWELL		DISTRICT: Lansing
CITY: HOWELL		COUNTY: LIVINGSTON
CONTACT:		ACTIVITY DATE: 03/28/2023
STAFF: David Rauch	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: A routine inspection of the facility to check compliance of PTI 47-17.		
RESOLVED COMPLAINTS:		

On March 28, 2023, the State of Michigan's Environment Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted a routine inspection of Precise Finishing Systems, Inc. The facility location is at 1650 Burkhart Rd., Howell, Livingston County.

The Environmental Contact:

Blake Barber, Operations Supervisor, 517-552-9200, bbarber@preciseusa.com

Facility Description:

This facility manufactures metal tubs and containers for other companies. The facility uses a dip tank of acid with a hood vent that pulls fumes away from the work area and while cleaning the metal products.

Regulatory Overview:

This facility is classified as a minor source due to the lack of Potential to Emit (PTE) criteria pollutants such as (carbon monoxide, nitrogen oxide, sulfur dioxide, volatile organic compounds, lead, particulate matter 10 and particulate matter 2.5 nor of Hazardous Air Pollutants (HAPs)). Facilities that have higher PTE are considered major sources and renewable operating permits are required for those sources.

Emission Units:

Equipment	Use	Exemption	Vented	Chemicals	Controls	Compliance
7 Gas Heaters	Heating Work Area	282(2)(b)	Internal	Natural Gas	NA	Yes
Milling Machine	Metal and Wood working	Rule 285(l) (vi) (B)	Internal	NA	NA	Yes
Metal Sheering Machine	Cutting Metal Sheets	Rule 285(l) (vi) (B)	Internal	NA	NA	Yes

Break Press	Bending Metal Sheets	Rule 285(l) (vi) (B)	Internal	NA	NA	Yes
3 Welding Stations	Welding metal parts	285(i)	Internal	NA	HEPA Filter System	Yes
Cleaner Tank	Rinses metals and removes debris	PTI 47-17	External		Fume Hood and Filter	No
Acid Tank	Cleans the metal and makes it shine	PTI 47-17	External	Acid	Fume Hood and Filter	No
Paint Booth	Painting metal sheets	287(2)(c)	External	Paints	Fume Hood and Filters	No

Facility History:

This facility has been Precise Finishing since 2017 when the PTI was approve. They have maintained the same operations for the history of the facility.

Inspection:

Arrived at the facility at 11:00 am and had to use the side door to buzz the office to enter the building. I was met by Blake Barber the facility Operations Supervisor. Upon arrival Blake stated he was newly appointed to the role of Operations supervisor and that the previous Supervisor had left without giving Blake notice of the permit requirements. During the discussion we found that the facility had been keeping purchase records for the acids and solvents they were using as well as the paints that they used on site. This was the first step in the record keeping for the facility. The facility stated they were no longer using the 2-butoxyethanol and was now using a less harsh cleaner. Upon review they are still using the 2-butoxyethanol.

Once we had discussed record keeping Blake showed me the facility and took me to the machining area. In the machining area the staff works on welding and assembling different styles of tanks for their various clients. In this area the metal sheets are cut to size and bent to the proper shape for the facility to make into containers. While on site the facility was working on a large water storage tank for an automotive facility. The welding area has a HEPA filter unit, and the air is exhausted internally. The facility also has an electrical area where they check the electrical systems that put on their tanks and used to work on their own electrical units.

In the back rinse tank area, the facility had 3 dip tanks for the metal. One tank was a rinse tank full of water and used primarily for rinsing the metals after they are cleaned. The cleaner tank was a 2000-gallon tank, that was not full, with the EP-Deox which is a clear that contains the 2-butoxyethanol. The last tank was a 2000 gal tank that contained the EP4000 Acid which is the electropolish with sulfuric and phosphoric acid. Based on the facility's PTI they are limited to 700 gallons of the acid electropolish and 60 gallons of the cleaning products containing the 2-butoxyethanol. The facility had no records of their usage and was only able to provide purchase records showing quantities bought but not used. Based on the purchase records the facility was over their limits on amounts of both acids and 2-butoxyethanol. The tanks were controlled by a hood vent that was running during the time of the inspection. Blake also took me outside of the facility to look at the exhaust stack and showed me the motor and how the vent system worked. The tanks are cleaned and maintained as the facility sees the liquid changing its color from usage.

The next portion of the facility is the painting room which has a filter system and a separation room where all the paints are stored. The filter system is exhausted outdoors and all paint used is run through the filter system to reduce emissions. The facility stated they use than less than 200 gallons of paint a month and may use 200 gallons used per calendar year. The paint room was very clean and while on site only one piece of equipment was being painted. The room also had a fresh air system that pumped in fresh air to reduce paint odors and keep the air cycling. The paint room staff was very knowledgeable about paint usage but did not have records for monthly usage.

Fee Status:

This facility does not meet the MAERS Fee criteria for a Category F source. This facility is not fee subject because they do not report to MAERS.

Location:

This facility is located off Burkhardt Rd. It is approximately 1000ft North of I-96 and when getting off at the I-96 Business Loop in Howell it is 500 ft West on N. Burkhardt Rd., directly west of the facility is the Tanger Outlet Mall. To the North of the facility is an industrial park and directly south is a plastics manufacturing facility, restaurant, and gas station. East of the facility is a large open field and then industrial facilities.

Facility Record Keeping: These are gallons purchased, not gallons used.

Month	2020 Gal	2021 Gal	2022 Gal	2023 Gal	Cleaner & Deox
January	0	220	550	550	110-gal Deox 2023

February	0	220	0	0	
March	0	0	0	0	
April	0	0	0	0	
May	0	0	0		
June	0	0	0		
July	0	0	0		55-gal Cleaner 2020
August	550	0	0		110-gal Deox 2021
September	0	220	0		
October	0	0	220		55-gal Cleaner 2022
November	0	0	0		
December	0	0	0		
Total (gal)	550	660	770	550	
Monthly Ave (gal)	45.83	55	64.17	45.83	

Conclusions:

The facility will be keeping more accurate records for the use of acids and solvents as the PTI states. A letter of violation will be sent to the facility as it has been out of compliance with PTI 47-17. Outside of record keeping the facility was very well organized and clean. Staff was

knowledgeable and willing to work with AQD staff to correct any record keeping violations. Facility did provide records of paint use and is maintaining records for polish and cleaner as of 05/25/2023. A violation letter will be sent addressing material limits and record keeping for PTI 47-17 and violation of record keeping for the paint booth. The facility will need to respond to the violation notice with a satisfactory method to prevent future violations.

NAME David RauchDATE 06/14/2023SUPERVISOR RB