DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

U50160173833843

FACILITY; Ebbco inc		SRN / ID: U501601738
LOCATION: 51536 Industrial Drive, New Baltimore		DISTRICT; Southeast Michigan
CITY: New Baltimore		COUNTY: MACOMB
CONTACT: Jeff Byrum , Purchasing		ACTIVITY DATE: 02/26/2016
STAFF: Rebecca Loftus	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOV
SUBJECT:		
RESOLVED COMPLAINTS:		

On February 23, 2016, and February 26, 2016, Joyce Zhu and I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an inspection of Ebbco Inc., located at 51536 Industrial Drive, in New Baltimore, Michigan. The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

Contacts

Mr. Patrick Bourgeois, Vice President of Manufacturing, pbourgeois@ebbcoinc.com Mr. Jeff Byrum, Purchasing, jbyrum@ebbcoinc.com

Inspection

I provided Ebbco staff with a copy of the "What to Expect from an Environmental Compliance Inspection" brochure and explained the purpose of our inspection. Mr. Byrum escorted Joyce and I though the building and explained the following:

Ebbco manufactures fluid filters for various industries. Mr. Byrum explained, at this location there is some fabrication, but most of the work is final assembly; i.e. assembly of components, welding/painting of the tanks, and completing control panel assembly.

The facility has six hand welders, two plasma cutters, grinding equipment, and a paint spray booth. The remainder of the building is used for office space and storage.

At the time of my inspection, the paint booth had properly installed filters and in 2015 Ebbco used 337 gallons of paint. In addition to the paint booth, a grey primer is sometimes used on parts; this is applied using aerosol cans.

The observed processes, as described above, appear to be exempt from obtaining an air Permit to Install pursuant to Rules 285(i), 285(j), 285(l)(vi)(B), 287(b) and 287(c).

<u>Applicable Michigan Air Pollution Control Rules</u>

Rule 285. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- (i) Brazing, soldering, welding, or plasma coating equipment.
- (j) Portable cutting torches.

- (I) The following equipment and any exhaust system or collector exclusively serving the equipment:
 - (vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following:
 - (A) Equipment used on a nonproduction basis.
 - (B) Equipment has emissions that are released only into the general inplant environment.
 - (C) Equipment has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

Rule 287. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- (b) A surface coating process that uses only hand-held aerosol spray cans, including the puncturing and disposing if the spray cans.
- (c) A surface coating line if all of the following conditions are met:
 - (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
 - (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
 - (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

Additional Information

Mr. Byrum and I also discussed Pollution Prevention opportunities and DEQ's Clean Corporate Citizen (C3) program. I will send Mr. Byrum additional information on these programs when I email him his copy of this inspection report.

Link to programs: http://www.michigan.gov/deq/0,4561,7-135-70153_70155---,00.html

Conclusion

Based on the information gathered, at this time, Ebbco appears to be in compliance with the Federal Clean Air Act and Michigan's Air Pollution Control Rules.

NAME POLICIO SUPERVISOR CIE