

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

B301930106

FACILITY: QUALITY SPRING TOGO INC		SRN / ID: B3019
LOCATION: 355 JAY ST, COLDWATER		DISTRICT: Kalamazoo
CITY: COLDWATER		COUNTY: BRANCH
CONTACT: Scott Smith , Environmental Management Representative		ACTIVITY DATE: 07/07/2015
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

Staff (Dale Turton) conducted an unannounced inspection at this company. Monica Brothers was also present for the inspection. The purpose of the inspection was to determine compliance with Michigan Air Pollution Control (APC) Rules and associated Permit to Install (PTI) Nos. 18-04 and 272-03. In addition to Scott Smith, Ned Yearling from the plant took part in the inspection.

Permit to Install No. 18-04 is an opt-out permit that limits facility-wide VOC and HAPs emissions. Permit No. 272-03 is a general permit for coating operations.

The facility produces various flat metal springs and hose clamps. After the flat stock is made into the part, possible operations may include heat treating, shot blasting, and coating.

During the inspection, Staff observed the following processes.

#### Heat Treating Ovens

There are various ovens at the plant. Some are electric and some are natural gas fired. The ovens are all exempted from permitting under APC Rule 282.

#### Coating Processes

There are 3 manually loaded dip/spin machines (257, 263, & 358) and 1 automatic enclosed spray booth (403) that exhaust into the same ductwork and stack. In the dip spin machines the parts are placed in a strainer basket, lowered into the coating barrel, then lifted and spun to remove excess coating. The parts are then dumped out to air dry. The enclosed spray booth is equipped with a filter. The filter is enclosed in a housing that can be slid out for periodic changing. A pressure switch is installed to cut off the fan if there is not a good draw across the filter. Various water based coatings are used in this area. The stack is in compliance with the 1.5 times the building height requirement.

There are two automatic dip/spin machines that are located together (514-515). The first stage uses the pigmented water based coating (Geomet). The second stage uses a water based clear coating (Plus 10). Each dip/spin machine has its own stack. Each of the stages has its own natural gas fired cure oven. Each oven has its own stack. All four stacks are in compliance with the 1.5 times the building height requirement.

All of the coating operations are covered under General Permit No. 272-03. They are keeping records for all of the coatings and thinners, their usage, and the calculations of the emissions. They are in compliance with the 10 ton per line and 30 ton for all lines combined limit.

**Part Cleaners**

Staff observed three part cleaners during the inspection. All of the cold cleaners are immersion style. They use a petroleum distillate (mineral spirits) with a 148 deg. F flash point. Safety Kleen supplies the solvent and services the units. The lids on all of the cleaners were closed while not in use. The company has been given the DEQ supplied orange operating instructions to post near the units. They are considered in compliance with Rule 707.

**Shot Peening**

There are 2 shot-peening machines exhausted through settling chamber type pre-cleaners and controlled by a baghouse collector. The baghouse is located outdoors and exhausts outdoors.

This is a pulse jet cleaned baghouse but the filters are only cleaned when the differential pressure rises to a high level set point. A daily log is kept for this baghouse as well. The  $\Delta P$  for the baghouse was 2 inches of water at the time of the inspection. There was no evidence of leaking ductwork or from the baghouse housing. No VE's were observed from the stacks either during the visit or at other times. This operation is exempt due to Rule 285(l)(vi)C). The  $\Delta P$  is read and logged once per day.

**Facility Wide**

The facility is also covered under Permit No. 18-04, which is an opt-out permit. The opt-out permit has a 90 tpy VOC limit, which for the coating operations only, is superseded by the 30 tpy limit in 272-03. They are keeping records of the VOC and HAPs emissions in order to comply with the synthetic minor limits. They are in compliance with the HAPs limits in the permit. The company reported a plant-wide VOC emission of about 2.2 tons for 2014.

NAME Dale TurtonDATE 7/13/2015 SUPERVISOR M07/18/2015