

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

B884464526

FACILITY: R & B Manufacturing Co. (was Flexible Metals)		SRN / ID: B8844
LOCATION: 7495 E M-36, HAMBURG		DISTRICT: Lansing
CITY: HAMBURG		COUNTY: LIVINGSTON
CONTACT: Thomas Brotherton , Maintenance Manager		ACTIVITY DATE: 09/13/2022
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection to determine compliance with Michigan Air Pollution Control Rules and federal regulation 40 CFR Part 63, Subpart XXXXXX. The facility currently does not hold any air use permit to installs (PTIs).		
RESOLVED COMPLAINTS:		

District Inspector: Matt Karl

Facility Contacts: Thomas Brotherton, Maintenance Manager

Purpose:

The purpose of this inspection was to determine R & B Manufacturing (Flexible Metals) (B8844) compliance with Michigan Air Pollution Control Rules and federal regulation 40 CFR Part 63, Subpart XXXXXX. The facility currently does not hold any air use permit to install (PTIs). The facility was last inspected on 01/22/2014 and it was determined that all of the permitted equipment actually had been removed from the facility or had applicable exemptions.

Facility Description:

This facility operates as an original equipment manufacturer (OEM) that produces primarily exhaust manifolds for cars, trucks, heavy construction equipment, and military vehicles.

The equipment descriptions and applicable exemptions are included in the table below:

Emission Unit Description	Relevant Exemption
Welding stations and metal tube forming processes with electrostatic precipitators and subsequent cloth filters, exhausting to the in-plant environment.	R 336.1285(2)(I)(i) The requirement to obtain a permit to install does not apply to any of the following equipment and any exhaust system or collector exclusively serving the equipment, which is used for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals.
Manual welding stations with shared electrostatic precipitator, exhausting to the outside air;	R 336.1285(2)(i) The requirement to obtain a permit to install does not apply to any of the following

<p>Saw with cyclone and Torit filter, exhausting to in-plant environment.</p>	<p>equipment: brazing, soldering, welding or plasma coating equipment.</p> <p>R 336.1285(2)(I)(vi)(B) and/or (C)</p> <p>Applies to 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 board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:</p> <p>Equipment that has emissions that are released only to the general in-plant environment, and/or</p> <p>Equipment that 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.</p>
<p>Laser cutter in enclosed booth with electrostatic precipitator and cloth filter.</p>	<p>R 336.1285(2)(I)(vi)(C)</p> <p>Applies to 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 board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:</p> <p>Equipment that 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.</p>
<p>Water-based parts cleaner.</p>	<p>R 336.1285(2)(I)(iii)</p>

	<p>Equipment for surface preparation of metals by use of aqueous solutions, except for acid solutions.</p> <p>R 336.1285(2)(r)(iv)</p> <p>Equipment used for any of the following metal treatment processes if the process emissions are only released into the general in-plant environment: Cleaning.</p>
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Inspection:

I (Matt Karl) met on-site with maintenance manager Thomas Brotherton. We discussed the current equipment present at the facility. Thomas provided me with a floor plan of the facility. We performed a facility walkthrough.

There have not been significant changes to the facility’s operations or equipment. The table above in the facility description accurately represents the equipment present at the facility and the applicable Rule 201 permit to install exemptions. The process cells and welding stations are all equipped with Robovent brand dust collectors. The filters on these dust collectors are changed on a preventative maintenance schedule on a quarterly or bi-monthly basis depending on the process. Most of the dust collectors vent to the in-plant environment. There is one welding station that exhausts to the outside environment and is also equipped with a Torit brand cyclone control, with particulate matter collection barrels located inside the facility. The laser cutter booth is only used infrequently and at a low volume. The water-based parts cleaner solution consists of DI and rust inhibitor and is cleaned monthly.

The facility is in the process of adding hydroforming equipment, which uses pressurized deionized (DI) water to soften and form piping. This equipment is not expected to have significant air emissions and is not expected to trigger the Rule 201 requirement to obtain a permit to install.

I inquired whether the facility was subject to 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

On 10/06/2022 Thomas Brotherton emailed that the facility’s SIC code is 3498 and NAICS code is 332996 – Fabricated Pipe and Pipe Fitting Manufacturing. It does not fall into one of the nine metal fabrication and finishing source categories that are subject to 40 CFR Part 63, Subpart XXXXXX.

Table 1. Nine Metal Fabrication and Finishing NESHAP Area Source Categories: Potential SIC/NAICS Codes

	EPA Source Category	SIC Description	SIC Code	NAICS Code	NAICS Description
1			3621	335312	

	Electrical & Electronic Equipment Finishing Ops	Motors and Generators Manufacturing			Motor and Generator Manufacturing
		Electrical Machinery, Equipment, & Supplies, NEC	3699	335999	All Other Misc. Electrical Equipment & Component Mfg.
2	Fabricated Metal Products, NEC	Fabricated Metal Products, NEC	3499	332117	Powder Metallurgy Part Manufacturing
		Fabricated Metal Products, NEC	3499	332999	All Other Misc. Fabricated Metal Product Mfg.
3	Fabricated Plate Work (Boiler Shops)	Fabricated Plate Work and Boiler Shops	3443	332313	Plate Work Mfg.
				332410	Power Boiler & Heat Exchanger Mfg.
				332420	Metal Tank (Heavy Gauge) Manufacturing
4	Fabricated Structural Metal Manufacturing	Fabricated Structural Metal Fabrication	3441	332312	Fabricated Structural Metal Manufacturing
5	Heating Equipment, except Electric	Heating Equipment, except electric	3433	333414	Heating Equipment (except Warm Air Furnaces) Mfg.
6	Industrial Machinery & Equipment: Finishing Ops	Construction Machinery Manufacturing	3531	333120	Construction Machinery Manufacturing
		Oil and Gas Field Machinery Equipment Mfg.	3533	333132	Oil and Gas Field Machinery and Equipment Mfg.
		Pumps and Pumping Equipment Mfg.	3561	333911	Pump and Pumping Equipment Manufacturing
7	Iron and Steel Forging	Iron and Steel Forging	3462	332111	Iron and Steel Forging
8	Primary Metal Products Manufacturing	Primary Metals Products Manufacturing	3399	332618	Other Fabricated Wire Product Manufacturing
9	Valves and Pipe Fittings, NEC		3494	332919	

	Valves and Pipe Fittings, NEC		Other Metal Valve and Pipe Fitting Manufacturing
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Conclusions:

At the time of my inspection the R&B Manufacturing/Flexible Metals equipment all operates under appropriate permit exemptions. The facility is in compliance with Michigan Air Pollution Control Rules.

NAME Matthew K. Kard

DATE 10/6/2022

SUPERVISOR RB