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

F743466560

FACILITY: JONES ELECTRIC CO.		**SRN / ID:** F7434
LOCATION: 1965 SANFORD ST., MUSKEGON		**DISTRICT:** Grand Rapids
CITY: MUSKEGON		**COUNTY:** MUSKEGON
CONTACT: Rod Dobb , Owner		**ACTIVITY DATE:** 02/14/2023
STAFF: Scott Evans	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: On site inspection to assess compliance with air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Introduction

On February 14, 2023, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an on-site, unannounced inspection of the Jones Electric Co. facility located at 1965 Sanford St. in Whitehall, Michigan, to assess compliance with all applicable air quality rules and regulations. Jones Electric Co. is a repair shop for electrical motors that utilizes a natural gas burnoff oven to remove substances such as paints and oils from engine components. This facility has one Permit to Install (PTI): PTI No. 197-05.

Upon arrival at the facility, SE conducted an initial perimeter inspection of the facility exterior. During this inspection there were no observed visible emissions or odors. After this was completed, SE approached the facility and was greeted by facility staff. After a brief discussion to explain the purpose of the day's visit, an inspection of the facility interior was conducted in which the burnoff oven, machining floor, and boiler room were visited to assess compliance with permit requirements and all other air quality rules and regulations.

PTI No. 197-05

This PTI includes one emission unit (EU), labeled EUBURNOFF, which is the burnoff oven used to remove paints, oils, and greases from metal engine components. It has 16 special conditions (SCs) as discussed below.

SC1.1 establishes that there shall be no visible emissions released from the EU. During the inspection the permitted equipment was not in operation. Facility staff expressed that there had been no incidents of visible emissions from the EU since the last inspection.

SC1.2 states that only natural gas may be used to operate the EU. During the inspection this was discussed, and the facility expressed that only natural gas is used for the equipment.

SC1.3 states that only paint, oils, and grease may be removed from metal parts, racks, or hangars within the EU. During the inspection this was discussed, and the facility expressed that this is all the equipment is used for.

SC1.4 states that the EU may not be used for the thermal destruction of specified items that are not included in SC1.3. During the discussion of uses of the burnoff oven, the facility confirmed that only substances listed in SC1.3 are processed in the equipment.

SC1.5 states that no transformer cores shall be processed in the oven due to risks of contamination with substances not approved for burnoff. This was discussed and the facility expressed that no transformer cores are processed in the EU. During the inspection a collection of equipment waiting to be entered into the oven could be seen and no transformer cores were present in this collection.

SC1.6 requires that the secondary chamber of the EU be properly installed, maintained, and operational during use of the EU. Proper functionality is demonstrated by maintaining a temperature of at least 1400°F during operation. During the inspection, the machine was not in use. It was discussed that the facility only activates and uses the machines when large amounts of components are ready to be placed in it. A small selection of components was seen near the machine, waiting for the next operation. The facility maintains a historic record of temperature logs, which were reviewed and appeared to demonstrate historic compliance. A copy of these records was provided by facility supervisor Rod Dobb and are included with this report.

SC1.7 states that, in addition to the above temperature requirements, an automatic temperature control system shall be installed and operational. During the inspection this system appeared to be installed, operational, and providing the temperature records discussed above.

SC1.8 requires that an interlock system that automatically shuts down the EU if it is not operating properly. During the inspection this system appeared to be part of the EU as required and the facility expressed that ensuring this system is operational is part of the consistent maintenance conducted on the equipment.

SC1.9 requires that the automatic temperature monitoring system be programmed to record the temperature every 15 minutes during operation. The records discussed above showed that this requirement was being met.

SC1.10 requires that thermocouples be calibrated annually. During discussions of maintenance, it was discussed that this requirement is being met.

SC1.11 requires that temperature logs be maintained on file for at least five years. As discussed above, the logs were being properly maintained and were reviewed for compliance with other conditions within this permit.

SC1.12 states that records of any malfunctions of the equipment and maintenance logs shall be maintained on file. Maintenance logs were maintained appropriately and were reviewed on site to confirm discussed maintenance operations such as thermocouple calibrations. A copy of maintenance activity conducted was included with provided temperature logs as well.

SC1.13 requires that a list of materials being processed in the burnoff unit be maintained on site. These were properly maintained in the form of SDSs, which were available on site and appeared to be properly maintained.

SC1.14 requires that records demonstrating the presence of an afterburner, a temperature control system, and the interlock system are all installed. The EU specifications documents demonstrate the presence of such components and there have been no changes made to the equipment, demonstrating proper compliance.

SC1.15 establishes required height for the stack used to vent the EU. This stack was not measured directly during the inspection for safety reasons, but on visual inspection the stack did appear to comply with the requirements.

NAME Scott Evans DATE 3/7/2023 SUPERVISOR