

N0765
Maina
Monroe

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

N076529117

FACILITY: NATIONAL GALVANIZING HS PROCESSING LP		SRN / ID: N0765
LOCATION: 1500 TELB ST, MONROE		DISTRICT: Jackson
CITY: MONROE		COUNTY: MONROE
CONTACT: Frank Belanger, Maintenance Manager		ACTIVITY DATE: 04/09/2015
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Complete scheduled inspection. Minor Source permit metal treatment line. Clean and Galvanize steel coils.		
RESOLVED COMPLAINTS:		

Inspection date: 4/9/2015

Contacts: Frank Belanger, Maintenance Manager, frank.belanger@nationalgalvanizing.com

Rebecca Riley, PHR, Human Resources Manager, becky.riley@nationalgalvanizing.com

SRN: N0765, Monroe County

On April 9, 2015, the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced complete scheduled compliance inspection at the National Galvanizing L.P. (hereinafter NG) located at 1500 Telb Road, Monroe. The purpose of the inspection is to determine the facility's compliance status with applicable federal and state regulations, in particular Part 55, Michigan Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules and the conditions of NG's Air Use Permit to Install (PTI) No.65-89.

This facility is a pickling, galvanizing and splitting operation. They bring in rolls of steel, pickle it in a hydrochloric acid bath to clean it up and then they galvanize the steel. The coils are then cut to any width requested by their customers. The pickling process is covered by PTI 65-89 and includes a hot acid bath, a multi-sieve-tray type scrubber with a mist eliminator section in the stack, and a steam generator (a dual fuel capable boiler, only natural gas fuel is used). The galvanizing process does not have a permit and was apparently originally permitted (@1984) but was later determined to be exempt.

During the inspection I asked if NG has an emergency generator and Mr. Belanger said they bought an old Waukesha Serial No. F2895GSI and installed it approximately in September, 1998. Mr. Belanger said it was converted to natural gas (was likely originally diesel). I informed NG about the Act 451, Rule 201 requirement to obtain a permit unless the process/equipment meets the exemption size of less than 10 MMBTU/hr maximum heat input. I also briefly explained that there are also Federal regulations that may apply, 40 CFR 60, New Source Performance Standards (NSPS) and/or National Emission Standards for Hazardous Air Pollutants (or Maximum Achievable Control Technology) for Reciprocating Internal Combustion Engines (RICE) Subpart ZZZZ. I told them that specific information is required about the emergency generator and when they purchased/installed it and I will be able to assist them in determining the applicable requirements. I also explained they will at a minimum need to conduct regular maintenance on the engine and track hours it operates.

INSPECTION

Upon my arrival I introduced myself to the receptionist, signed in and provided my identification and stated the purpose of my visit. AQD's last inspection was conducted on May 5, 2011. Prior contact listed in AQD's NG plant file is Mike Miller, Quality Manager, who I was told was not there today. I met with Rebecca Riley, Human Resources Mgr., Frank Belanger, Maintenance Mgr. and Mrs. Riley's son Brandon, who also works for NG.

I reviewed the purpose of the inspection, the facility permit, and had a general pre-inspection conference. Mr. Belanger explained the process. Mr. Belanger, Mrs. Riley and her son all accompanied me during the physical plant inspection of their operations. I was informed that NG operates 3

18. The exhaust gases from the pickling process shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 72 inches at an exit point not less than 90 feet above ground level.

Finding – Compliant. The stack was installed several years ago and has not been changed. It is very tall and I observed the stack has test port holes and an obvious section that is said to hold the mist eliminator. I did not conduct a roof inspection at this time.

Mr. Belanger and Mrs. Riley stated that Mr. Miller maintains all records electronically and it would be best if he forwarded these to me. I provided a list of what was required based on the permit and my observations during the inspection. The agreed upon date for submittal is Friday, April 17.

During the inspection I observed the Pickling Process Line steam Boiler that uses only natural gas; the original permit application indicates it as natural gas fired. The Serial no. RU14979 and Model No. F-2895-GSIU 480 V. The boiler plate states it is 8.4 input MMBTU/hr. The PTI 65-89 has no emission limits for the boiler. It appears it is not subject to the federal NSPS Subpart Dc due to it's size and possibly the installation date. I gave Mr. Belanger a DEQ Fact Sheet for this federal standard. It also appears to not be subject to the newer Area Source Boiler MACT standard Subpart JJJJJJ because it uses natural gas only.

I observed the emergency generator. It was not operational and appeared to be an older model.

COMPLIANCE SUMMARY

On 4-16-15 NG submitted by email their Work Orders for the Boiler and Scrubber, MSDSs for oil, caustic and rust preventative; and the Scrubber test results from March 2013. On 4-17-15 NG submitted the Work Orders for the Draeger tube HCl testing and provided additional information for the Emergency Generator.

The AQD determined that National Galvanizing is in substantial compliance with the applicable federal and state regulations and their PTI 65-89 at this time.

NAME *Dianna K. Veltort* DATE *4/20/15* SUPERVISOR *[Signature]*