

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

N172759258

FACILITY: Key Gas Components Inc.		SRN / ID: N1727
LOCATION: 1303 LINCOLN RD, ALLEGAN		DISTRICT: Kalamazoo
CITY: ALLEGAN		COUNTY: ALLEGAN
CONTACT: Garret Strbik, Plant Manager		ACTIVITY DATE: 08/05/2021
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-Site Inspection		
RESOLVED COMPLAINTS:		

On August 5, 2021, Air Quality Division (AQD) staff (Cody Yazzie) arrived at 1303 Lincoln Road Allegan, Michigan at 1:00 PM to conduct an unannounced air quality inspection of Key Gas Components Inc. (hereafter Key Gas). Staff made initial contact with the office receptionist and stated the purpose of the visit. Garret Strbik, Key Gas, Plant Manager, is the environmental contact and arrived shortly thereafter and took staff to his office for further discussions.

Key Gas was previously known as Crescent Metal Products. The name for the facility changed around 2003. The facility fabricates mainly metal piping to supply products for the gas appliance industry. The facility makes a lot of gas manifolds along with tubing and piping. Key Gas typically operates two shifts on from 6 AM to 2:30 PM and the second shift from 2:30 PM to 11 PM. It was indicated that they facility only paints during the 1st shift. The facility does not currently have an Air Quality Permit on file. The facility appears to be a minor source that is operating under Permit to Install exemptions.

Key Gas was last inspected by the AQD on January 16, 2008 and appeared to be in Compliance at that time with the State of Michigan Air Quality Rules. Staff asked, and Mr. Strbik stated that the facility does not have any emergency generators.

Mr. Strbik gave staff a tour of the facility. Required personal protective equipment are steel toe shoes, safety glasses, and hearing protection. Staff observations and review of records provided during and following the inspection are summarized below:

Metal Working Machines:

The facility has multiple metal working and tooling machines to fabricate the metal parts and piping used to create their products. The metal machining tools used at Key Gas included four CNC machines, one CNC Lathe, one CNC Bend, a flow drill that is used to heat the middle of a pipe to extrude and thread a hole, there is multiple drilling and tapping stations, and two welding stations. The metal working equipment appears to only be released to the general in-plant environment. Due to this the metal fabricating equipment appear to me the requirements of exemption Rule 285(2)(I)(vi)(B). The welding stations appear to meet the requirements of exemption Rule 285(2)(i).

Heated Cleaning Tanks:

The facility has three heated wash tanks that use a detergent to wash the metal parts. Each tank is equipped with one natural gas fired process heater that have maximum heat input rated for 75,000 BTU/hr. The natural gas fired process heaters used to heat the cleaning baths appear to

meet the requirements of Rule 282(2)(b)(i). The cleaning tanks only release emissions to general in-plant environment. The wash tanks appear to meet the requirement of Rule 285(2)(r)(iv).

Paint Booth:

The facility has a building located on the Northwest side of the main building that is used as paint booth. The booth is equipped with a fabric filter and stack. During the inspection the booth was in use. During the inspection the filter appeared to be in satisfactory condition. When asked how often the facility changes the filter it was stated that the filter for the paint booth gets changed about every 2 weeks. Staff mentioned that it appears during the previous inspection the facility was utilizing Rule 287(2)(c) at one point in time. Staff asked if the facility had records to show that paint usage was below 200 gallons minus water per month. Mr. Strbik stated that the facility that they didn't have any exact usage records on file but would be able to produce usage records based upon how much paint was bought monthly. Staff reviewed the paint usage records that were provided from January 2020 through July 2021. The records showed that the facility buys two separate paints. The highest total paint used for any one month during the reviewed time period occurred in December 2020 in which Key Gas used 36 gallons of paint. The facility is well below the required 200 gallons per month minus water. Staff indicate to the facility if it were to ever get to the point where it would be using more than 200 gallons per month on the paint line that it would have to look into acquiring a Permit to Install to operate the paint booth.

Cold Cleaner:

The facility did have one parts washer located at the facility. The cold cleaner appears to meet the requirements of Rule 281(2)(h). Staff did notice that the facility did not have the procedures for the proper operation of the cold cleaner posted on the outside of the cold cleaner. Staff stated to Mr. Strbik that if he would send a picture showing the instructions were posted on the outside of the cold cleaner that Staff would consider the issue resolved. Staff was provided a picture of the proper operation of the cold cleaner on August 11, 2021.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with State of Michigan Air Quality Rules. Staff stated to Mr. Strbik that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 1:45 PM.-CJY

NAME Cody Yuzgic

DATE 8/18/21

SUPERVISOR RIL 8/18/21