

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

N172768171

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: 07/12/2023
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Joint inspection with MMD and WRD due to Complaint.		
RESOLVED COMPLAINTS:		

On July 13, 2022 Air Quality Division (AQD) staff (Cody Yazzie) conducted a joint inspection involving Water Resources Division (WRD) and Materials Management Division (MMD) due to a complaint involving multiple air quality, water quality, and hazardous waste allegations. Other Staff that were present during the inspection were Terri Shattuck (WRD), Jeremy Rubio (WRD), and Krista Hettich (MMD). Environment, Great Lakes, and Energy (EGLE) Staff arrived at 1303 Lincoln Road, Allegan Michigan at 9:00 AM to conduct an unannounced joint multimedia inspection of Key Gas Components Inc. (hereafter Key Gas) SRN (N1727). Staff made initial contact with John Blount and stated the purpose of the visit. Garret Strbik, Key Gas, Plant Manager, is the AQD environmental contact and arrived after the facility walkthrough and provided assistance in answering process and records questions.

The complainant stated in an email the following: "They do not properly train employees to handle or work around the chemicals and expose them to poor air quality around the wash area with only exhaust fans that do not work properly". The AQD does not regulate "indoor air quality" but AQD Staff did think that poor handling of chemicals could lead to fugitive emissions that could need to be addressed and fall under the regulatory authority of the AQD.

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. 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 August 5, 2021 and appeared to be in Compliance at that time with the Environmental Protection Act 1994 PA 451 (Act 451). Staff asked, and Mr. Strbik stated that the facility does not have any emergency generators.

Mr. Blount gave EGLE staff a tour of the facility. Required personal protective equipment are safety glasses and steel toe boots. AQD Staff observations and review of records provided for during and following the inspection are summarized below:

Metal Working Machines:

Previously mentioned in prior inspection reports 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. These emissions units appear to still be in operation. Due to this the metal fabricating equipment appear to meet the requirements of exemption Rule 285(2)(l)(vi)(B). The welding stations appear to meet the requirements of exemption Rule 285(2)(i).

Heated Cleaning Tanks:

Based on previous inspection reports the facilities appeared to increase the heated cleaning tanks from 3 to 5 separate tanks. The tanks are labeled with what solutions are used in each. At the time of the inspection the facility labeled the tanks the following: NC-1091 wash, Clean water, phosphate tank CC-8030, Clean water, and Rust Prevention NC-100. These cleaning and surface treatment processes appeared to utilize Rule 285(2)(r)(i) and Rule 285(2)(r)(iv). These exemptions are for equipment that are used for the surface treatment and cleaning of metal if the process emissions are only released into the general in-plant environment.

During the inspection it was noted that the facility had two windows located directly above the tanks and a fan blowing the emissions that were coming off the tanks toward the windows. Staff asked how often the facility keeps the windows open and the fans blowing over the tanks as they had during the inspection. Mr. Strbik stated that the facility almost always has them open in the summer as they do it to bring in a breeze and keep the facility cool. Staff mentioned that this is technically a Rule 201 violation as it does not comply with Rule 285(2)(r)(i) and only being released into the general in-plant environment. Staff mentioned that this could easily be resolved with closing the windows or finding a solution that directs airflow to the center of the plant and not exhausting out the windows. Staff mentioned to Mr. Strbik that due to the easy solution that could be utilized by the facility to comply with the Rule 285(2)(r)(i) and Rule 285(2)(r)(iv) exemptions that a violation notice did not seem needed to be issued. Staff did note that if in following inspections the facility did have the same issue that a violation notice may be warranted at that time.

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). These heaters have tubing that go through the bottom the tanks to provide he heat. These heaters then exhaust outside the building near the tanks.

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 not in use but hooks were hanging to dry. During the inspection the filter appeared to be ripped and heavily "caked" in used paint. Staff mentioned that the facility should change the filter when it gets these large rips. The rips reduce the effectiveness for the Particulate Matter (PM) emissions. Staff mentioned that if the facility sent AQD Staff a picture of the filter replaced AQD staff would consider the issue resolved. Staff was sent a picture on July 13, 2023 of the new filter that had been installed.

Staff mentioned that it appears during the previous inspection the facility was utilizing Rule 287 (2)(c). 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 April 2023 to July 2023. 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 June 2023 in which Key Gas purchased 12 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.

Staff ended the inspection identifying the ripped/inadequate fabric filter condition and the surface treatment tanks for metal parts exhausting out the windows to atmosphere as areas for concern. Both if not addressed appropriately are violations of Rule 201 because they are not meeting the requirements of their respective permit exempt rules (Rule 287(2)(c) and Rule 285(2)(r)(i)&(iv)). Staff was provided with a picture a newly installed fabric filter that would be adequate for operation and appear to meet the requirements of Rule 287(2)(c) and appears to be resolved. Staff believes that closing the windows or finding a solution that directs airflow to the center of the plant and not exhausting out the windows can easily be implemented to comply with Rule 285(2)(r)(i)&(iv). Staff mentioned that in following inspections if the same issues were identified that a violation notice may be warranted at that time. Besides the identified issues that appeared to be resolved following the inspection the facility appears to be in compliance with Act 451 Regulations.

The allegations of poor air quality around the wash area do not appear to be an issue regulated by AQD. Staff left a voicemail on July 14, 2023 indicating to the complainant that these complaints should be submitted to MIOSHA. -CJY

NAME Cody Younger

DATE 7/17/23

SUPERVISOR Morgan