

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

N759626721

FACILITY: DEXTER FASTENER TECHNOLOGIES INC.		SRN / ID: N7596
LOCATION: 2110 BISHOP CIRCLE EAST, DEXTER		DISTRICT: Jackson
CITY: DEXTER		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 08/28/2014
STAFF: Glen Erickson	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Inspection prompted by questions from Plant Engineer Don Simones about proposed acquisition of a new process that would be relocated to this facility, and how to decide if it should have a PTI.		
RESOLVED COMPLAINTS:		

Scheduled inspection of facility with Plant Engineer Don Simones. Simones had e-mailed me to inquire how he might decide whether a new proposed project they are considering acquiring and relocating to this location would require a permit to install or possibly could demonstrate compliance with a permit exemption. I decided that I needed to inspect the plant to properly offer an opinion.

The company is considering acquiring a coating process, with a curing oven, for applying a surface coating to small metal parts. He knows only a little about the process, such as, that it is a roto-spin flow coating machine that applies the coating. He does not know the exact coating(s) to be applied, but only the general type of product. He had an MSDS for an example of this general type of coating, which identified 2 alcohols(ethanol and methanol) as components, along with a significant amount of proprietary components. Also, 30-some % is water in the coating.

He was given some estimate of monthly projected usage of the coating of about 150-165 gals./mo. He was concerned about the 200 gal/mo. limit in permit exemption Rule 287(c). I told him that he would subtract out the water in the formulation, which is 30-something %. So a safe estimate of as applied, minus water coating usage/mo. would be about 100-110 gal. So unless and until their usage would increase significantly, they probably will easily remain in compliance with the 200 gal/mo. limit of Rule 287(c).

Simones was concerned about demonstrating compliance with Rule 278 without knowing the specifics of the coating formulation. I told him to assume 7.36 lbs./gal as the worst-case VOC content for a coating. That comes to 8.8 tons/yr. compared with the significance level for VOC of 40 tpy.

We went into the plant. Simones showed me the current set-up with 8 heat treat furnaces in place; labelled Furnace A through Furnace H. They added on to the south side of the building so that they can potentially add another heat treat furnace, as well as, the proposed roto-spin coating process.

Outside of the south wall of the building is situated a brand new natural gas emergency generator, installed in early August, 2014. This unit is subject to the NSPS, Subpart JJJJ regulation. Unit is a 100 KW (153 Hp) Cummins RICE.

No other process additions or changes from last inspection in 2012.

Company still keeps records showing that the heat treat furnaces with oil quench all meet the requirements of Rule 290, as demonstrated by their consultant Nth, showing that the only pollutant that continues to need monitoring/recordkeeping is PM.

I asked Simones to provide an estimate of the amount of natural gas consumed in this plant. He came up with a current monthly natural gas consumption figure of 14.2 MMCF/mo.; or 170 MMCF/yr. Assuming the standard emission factor for such devices of 100 lbs. NOx/MMCF natural gas, their yearly consumption translates to 8.5 tpy.

I told him that these low amounts keep the facility from having to report to MAERS at this time.

He provided the EPA certification for the Cummins spark ignited emergency generator relative to 40 CFR, Part 60, Subpart JJJJ.

Consider the facility in compliance with all applicable air regulations, at this time.

NAME GLEN ERICKSON

DATE 9-2-14

SUPERVISOR 