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

N818842428

FACILITY: JACKSON METAL CLEANING		**SRN / ID:** N8188
LOCATION: 3507 WAYLAND DR, JACKSON		**DISTRICT:** Jackson
CITY: JACKSON		**COUNTY:** JACKSON
CONTACT: Dennis Cones , President, Sales		**ACTIVITY DATE:** 11/22/2017
STAFF: Mike Kovalchick	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:**
SUBJECT: Unannounced compliance inspection.		
RESOLVED COMPLAINTS:		

Minor Source-

Facility Contacts

Tyler Lang-Sales

tlang@jacksonmetalcleaning.com

517-784-9660

Dennis Cones-Owner

dcones@jacksonoven.com

517-784-9660

Website: http://www.jacksonoven.com

Purpose

On November 22, 2017, I conducted an unannounced compliance inspection of Jackson Metal Cleaning (Company) located in Jackson, Michigan in Jackson County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and Permit to Install (PTI) # 366-08B which was issued on January 14, 2014.

Facility Location

The facility is located in an industrial park in Jackson. See attached aerial photo.

Facility Background

The facility was last inspected on 2/21/2013 and found to be in compliance.

Regulatory Applicability

PTI 366-08B covers the paint burn-off oven.

Arrival & Facility Contact

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at 9:00 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Tyler Lang (TL)-Sales. I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

TL extended his full cooperation and fully addressed my questions.

Pre-Inspection Meeting

TL outlined that Jackson Oven Supply, Inc is the parent company of Jackson Metal Cleaning. Jackson Oven Supply manufactures/sells burn-off ovens. Jackson Metal Cleaning has an operating paint burn-off oven that is

used by various clients. Each company has a separate building that are adjacent to each other. Jackson Metal Cleaning currently has only one dedicated employee and operates between 6:00 am to 5:00 pm 5 days a week. Jackson Oven Supply manufactures about 20 burn-off ovens a year. There are no regulated sources of air pollution in the building.

The burn-off oven operates about once per day with a 2 to 4 hour cycle. The oven is operated at between 750 to 800 degrees F. and the afterburner at between 1550 to 1600 degrees F. Both the oven and afterburner are interlocked. The burn-off oven is maintained by technicians that work with Jackson Oven Supply. They keep track on what type of paint/material is burned on a spreadsheet and keep the circular recorder temperature charts for both the oven/afterburner readings.

At the very end of the meeting, we were joined by Dennis Cones (DC) who is the owner.

Onsite Inspection

TL and DC gave me a tour of first the Jackson Oven Supply manufacturing building and then the building that contained the burn-off oven.

The manufacturing building contained a couple of exhaust fans on the side walls but no dedicated exhaust from any of the small machining operations that were located there.

Next, we entered the building containing the burn-off oven. It was not in operation. See attached photo of the burn-off oven. It appeared to be in excellent working order. The exhaust stack contained a heat exchanger that is used to heat the building. See attached photo. See attached photo of the temperature gauge which showed a setpoint of 800 Deg. F for the oven and 1550 Deg. F for the afterburner. Several metal cages containing material to burned were queued up adjacent to the oven. See attached photos. All the items to be burned appeared to be allowed under PTI 366-08B. One metal cage contained material that had already been burned. See attached photo.

Recordkeeping/Permit Requirements Review

The spreadsheet information for October 2017 was unavailable for review by November 26th. Follow-up with the Company indicated that information for 2017 had not been compiled yet. See Attachment (1) which is an email from the Company.

The circular charts for October 2017 were incomplete but did show that the after burner is on during the whole time that the oven is in use. See Attachment (2).

PTI allows the burning of cured paints, oil or grease on metal parts, racks and/or hangers plus neoprene rubber and natural rubber, caster wheel polyurethane coatings and ADH glass bonding material. It appeared that the Company is in compliance with this requirement.

A review of all other substantive PTI conditions showed compliance.

Post-Inspection Meeting

I held a brief post-inspection meeting with TL and DC as I was walking out. I indicated to them that I didn't have any findings but would still need for them to forward copies of their tracking spreadsheet and temperature charts for the monthly of October by no later than November 26th. I thanked the 2 gentlemen for their time and cooperation, and I departed the facility at approximately 10:00 am.

Compliance Summary

The Company is out of the compliance with the following:

PTI 366-08B VI. Monitoring/Recordkeeping:

1. The permit shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to continuously monitor the temperature in the burnoff oven secondary chamber/afterburner and record the temperature at least

once every 15 minutes. The permittee shall keep the records on file at the facility and make them available to the Department upon request.

The Company will be sent a Violation Notice and will have 21 days to respond.

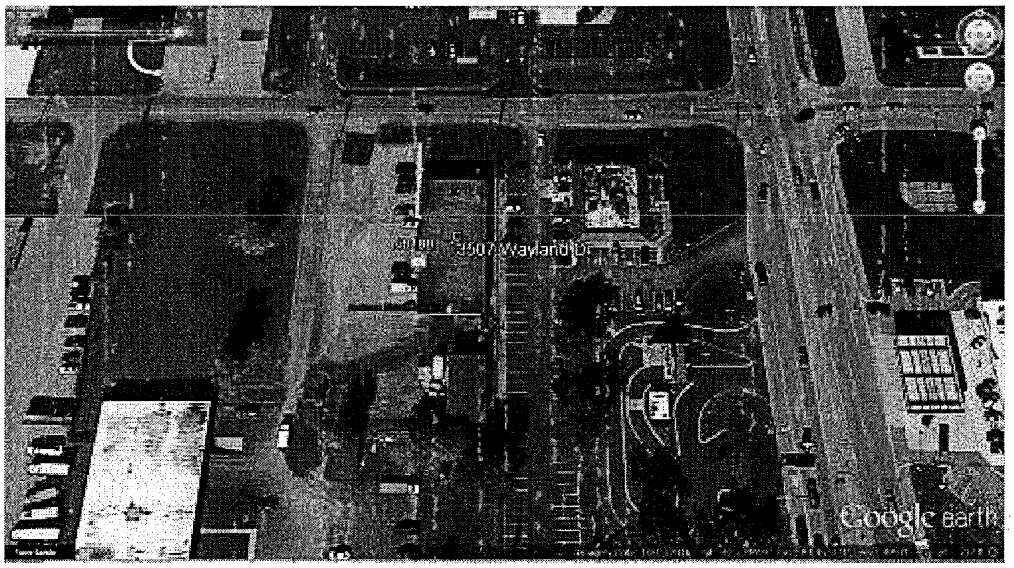

Image 1(Aerial photo) : Aerial photo of the facility.

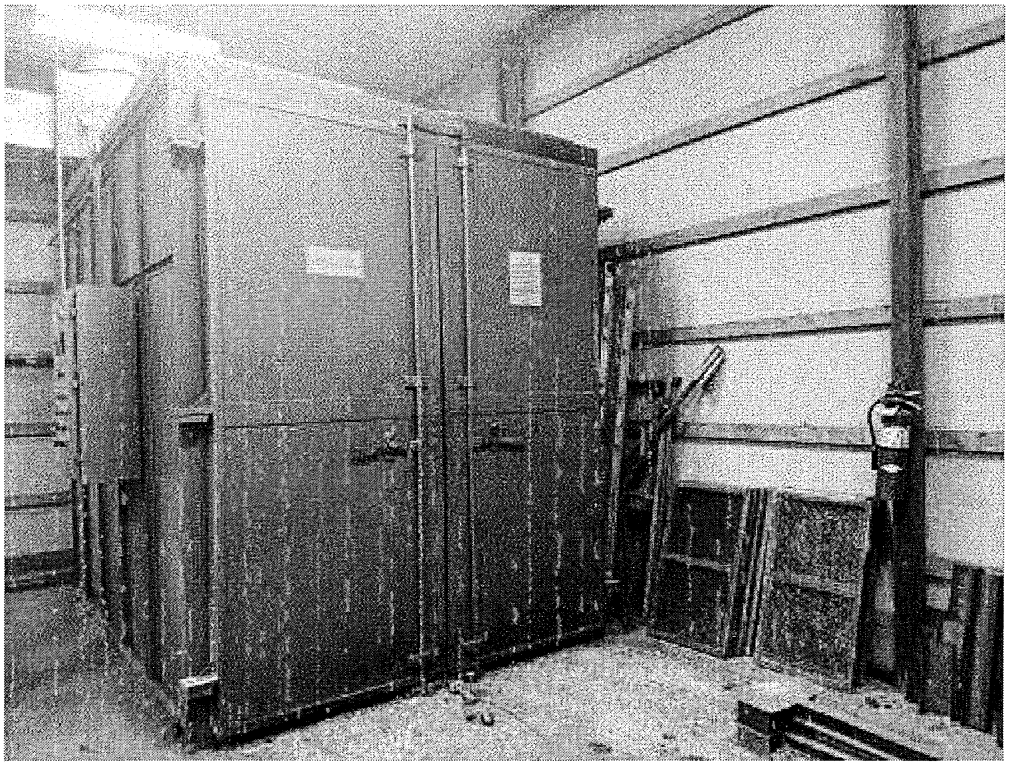

Image 2(Burn-off oven) : Burn-off oven.

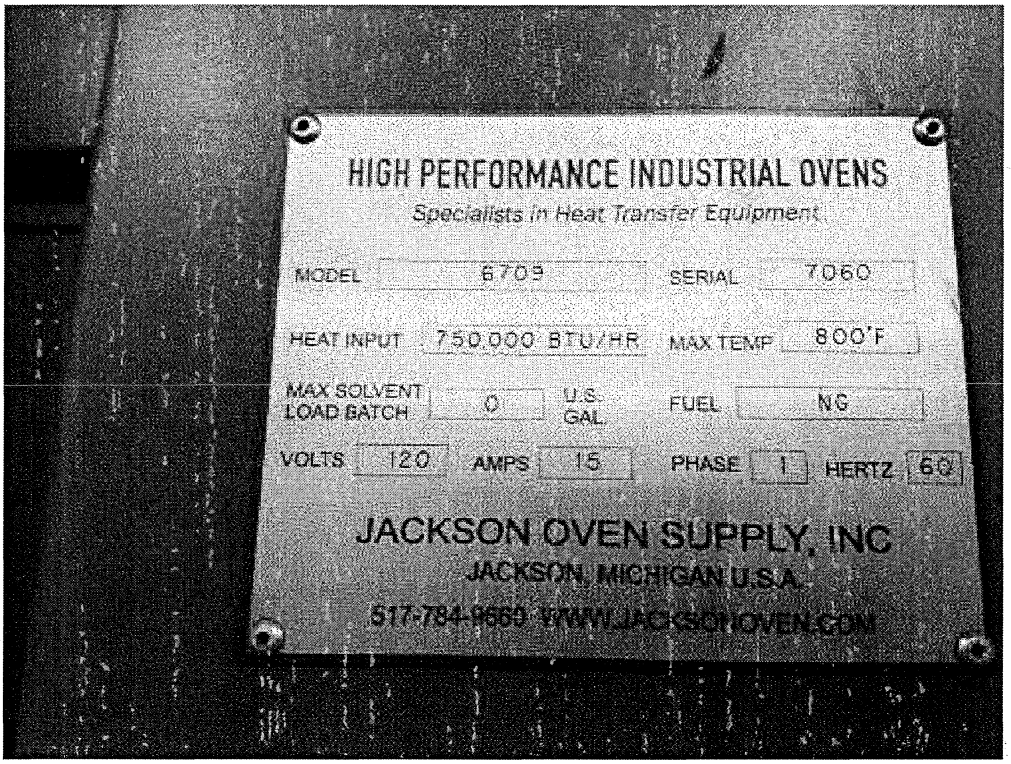

Image 3(Name plate) : Name plate on burn-off oven.

Image 4(Temperature control) : Temperature controls on oven and afterburner.

Image 5(Material to be burn) : Material to be burned.

Image 6(Material to burn) : Material to be burned.

Image 7(Material burned) : Material already burned.

NAME M. Kovalchuk DATE 12/4/2017 SUPERVISOR SS