DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

032144003				
FACILITY: MEC - North Plant		SRN / ID: P0921		
LOCATION: 1444 Alexander Road, VANDERBILT		DISTRICT: Gaylord		
CITY: VANDERBILT		COUNTY: OTSEGO		
CONTACT: Brooke Sprenger , Human Rescources		ACTIVITY DATE: 05/08/2018		
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor		
SUBJECT: Scheduled site inspection for automotive parts manufacturing facility. No previous inspection. sgl				
RESOLVED COMPLAINTS:				

INTRODUCTION

P002144800

On May 8, 2018, AQD District Staff arrived at MEC – North Plant, an employee owned company, to conduct a self-initiated site inspection. MEC -North Plant located at 1444 Alexander Road, Vanderbilt, Michigan, 49795. (P0921) The referenced facility was in operation at the time of the site inspection. At the time of the inspection, no history was known for the facility.

A walk thru of the Facility was conducted with Ms. Brooke Sprenger, Human Resources Staff with MEC and housed at the MEC -North Plant. Discussions with Ms. Sprenger indicated that the corporate office has had some evaluation with regards to environmental requirements for the plant, and that air permitting was not required for process equipment.

FACILITY

MEC has two plants in Vanderbilt, Michigan, and are referred to as the North Plant and South Plant. The South Plant, located at the intersection of 8276 Yuill Street is the former Van Products Company Facility (N2611). The North Plant, is the subject of this report. Otsego County Property Search records identified the facility as being located at 1444 Alexander Road, Vanderbilt, Michigan, and as owned by Center Manufacturing, Inc. of Mayville, Wisconsin. An internet search for MEC.com indicated that the full name is Mayville Engineering Company, Inc. a manufacturer of metal automotive components. The Facility is unfenced and ungated. The office entrance is toward the NE corner of the Facility.

Based on Otsego County property records, adjacent properties appear to be predominantly privately owned and undeveloped to the north, west, and south. Properties to the east are privately owned with a plane runway. Property to the southeast is a larger residential property.

Weather conditions at the time of the site visit were warm and sunny, with partially cloudy skies. No visible emissions (VEs) were noted at the time of the site visit. A view of the roof line, and review of aerial photos of the site failed to identify any process stacks.

PERMITTING

No permits are associated with the Facility.

REGULATORY

A determination of regulatory status for the site has not been completed at the time of report preparation, however the site is anticipated to be a true minor.

<u>EQUIPMENT</u>

At the time of the May 8, 2018, site inspection, the facility was operating. The site walk through was conducted with Ms. Brooke Sprenger. As previously noted, the facility manufactures metal parts/components for the automotive industry. Process activities noted during the site walk-thru included tanks for metal surface preparation (with no vapor capture system) as well as various cold metal forming activities, such as bending, stamping, brazing, soldering and welding (the later having emission capture systems that vent outside). In addition, the facility has two waste water evaporators used to reduce their waste stream.

Based on activities noted at the time of the site walk-through, it appears that most if not all would be exempt from Rule 201 permitting. The following summaries identify process equipment identified during the May 8, 2018, site visit, or believed to be associated with the facility:

Rule 281 Cleaning, Washing and Drying Exemptions:

PROCESS/ACTIVITY	EXEMPTION
Aqueous Wash Systems – no volatile solvents used	R281(2)(e)

Rule 285 Misc. Exemptions:

PROCESS/ACTIVITY	ASSOCIATED EQUIPMENT	EXEMPTION
Brazing, soldering and welding activities	brazing, soldering, welding or plasma coating equipment	R285(2)(i)
Bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning or extruding hot or cold metals.	exhaust into the in-plant environment or outside with appropriate pollution control device	R 285 (2)(I)(i)
Metal Grinding		R285 (2)(I)(vi)(B)
Pipe Cutting	Cutting Equipment	R285 (2)(l)(vi)(B)
Cleaning Solution Tanks	Equipment used for preparation of metal surfaces using aqueous solutions, does not include acidic	R285 (2)(I)(iii)
Surface Treatments - Cleaning	Metal treatment processes if emissions are only emitted into in-plant environment – cleaning specifically	R285 (2)(r)(iv)
Deburring		R285 (2)(I)(vi)(B)
Wastewater Evaporator (2)	located in building	R285 (2)(m)

Rule 287 Surface Coating Equipment:

PROCESS/ACTIVITY	ASSOCIATED EQUIPMENT	EXEMPTION
Oil Dip Vat/Tank	surface coating	R287(2)(C)

COMPLIANCE

As previously indicated, environmental evaluations conducted by a third party indicated that permitting was not required for processes onsite. Based on activities identified during the May 8, 2018, site inspection, it appears that most if not all activities onsite may be exempt from Rule 201 permitting, however, further clarification of activities and appropriate exemptions will need to be provided by the company. In addition, the company will be requested to initiate Rule 278 verification activities with respect to actual emissions. With the exception of clarification of Rule 278 emission levels and further clarification of Rule 201 exemptions by the Facility, no significant compliance issues were noted at the time of the inspection. Clarification of the above referenced issues are anticipated to be completed by the end of the present fiscal year.

MACES- Activity Report

NAME GURSON (Blanc

DATE 1972012 SUPERVISOR 5N