

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

U50160173633519

FACILITY: KBE Precisions Products, LLC		SRN / ID: U501601736
LOCATION: 51537 Industrial Drive, New Baltimore		DISTRICT: Southeast Michigan
CITY: New Baltimore		COUNTY: MACOMB
CONTACT: Karen Baumgarten, Owner		ACTIVITY DATE: 02/23/2016
STAFF: Rebecca Loftus	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT:		
RESOLVED COMPLAINTS:		

On February 23, 2016, I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an inspection of KBE Precision Products, LLC, located at 51537 Industrial Drive, in New Baltimore, Michigan. The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

I arrived on-site at 10:20am and spoke with Ms. Karen Baumgarten, Owner. I provided her with a copy of the "What to Expect from an Environmental Compliance Inspection" brochure and the Permit to Install Handbook. Her staff, Tammy and Gary, escorted me through the building and explained the following.

#### **Company Overview**

At this location KBE conducts metal fabrication for various applications and builds/repairs hoist. KBE also creates the tanks (metal boxes) for Ebbco located across the street. I also conducted an inspection at Ebbco; see the inspection report under ID: U501601738 for details.

#### **Inspection Observations**

During my inspection, I observed the following process equipment: metal shearing, metal cutting, metal bending, lathes, stamping, plasma cutting, CNC Machines, hand welding stations, and a paint booth.

The two processes that exhaust externally include the plasma cutting station and the paint booth. Ms. Baumgarten explained the plasma cutting equipment is not used as replacement parts are no longer made for this model.

For the paint booth, Ms. Baumgarten stated they buy paint in 5 gallon cans and use approximately 10 gallons in a year. No one was painting during my inspection, but I noted a fabric filter for particulate control was not properly installed. I explained that Rule 287(c), full texted listed below, requires usage records and a particulate control (fabric filter). Ms. Baumgarten explained that KBE does have filters and she would make sure staff installed one in the booth.

The observed processes, as described above, appear to be exempt from obtaining an air Permit to Install pursuant to Rules 285(i), 285(j), 285(l)(i), 285(l)(vi)(C), and 287(c).

**Applicable Michigan Air Pollution Control Rules**

Rule 285. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- ...
- (i) Brazing, soldering, welding, or plasma coating equipment.
- (j) Portable cutting torches.

...

(l) The following equipment and any exhaust system or collector exclusively serving the equipment:

(i) Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals.

...

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following:

(A) Equipment used on a nonproduction basis.

(B) Equipment has emissions that are released only into the general in-plant environment.

(C) Equipment has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

Rule 287. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

...

(c) A surface coating line if all of the following conditions are met:

(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.

(ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.

(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

**Conclusion**

Based on the information gathered, KBE appears to be in compliance with the Federal Clean Air Act and Michigan's Air Pollution Control Rules.

NAME

*Rebecca J. [Signature]*

DATE

*3/1/16*

SUPERVISOR

*CJE*