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

N007235900

FACILITY: AACTRON INC		**SRN / ID:** N0072
LOCATION: 29306 STEPHENSON HWY, MADISON HTS		**DISTRICT:** Southeast Michigan
CITY: MADISON HTS		**COUNTY:** OAKLAND
CONTACT: Erik Kafarski , President		**ACTIVITY DATE:** 08/03/2016
STAFF: Robert Elmouchi	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM 208A
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

On August 3, 2016, I conducted an unannounced scheduled inspection of Aactron, Inc. located at 29306 Stephenson Highway, Madison Heights, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of **N0072**. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; Rule 208a registration; and the conditions of General Permit to Install (PTI) No. 170-02.

Note: On February 3, 2016, the AQD received a Rule 208a annual renewal registration from Aactron. During the opening meeting of this inspection, Mr. Erik Kafarski and Mr. Ronald Wroblewski were provided an update that Rule 208a is scheduled to be rescinded in 2016 and that timely action must be taken to prevent a noncompliance when Rule 208a is rescinded. I informed Mr. Kafarski and Mr. Wroblewski that if Aactron does not obtain an approved permit to install that contains HAP limits before Rule 208a is rescinded then the AQD will issue a violation notice and it will be considered a high-priority violation, which may result in a consent order and fines. Aactron management has been informed of their option to apply for a HAPs opt-out permit that can be used in conjunction with their existing general surface coating permit or apply for a R201 site specific opt-out permit. Per my on-site meeting with Mr. Kafarski and Mr. Wroblewski on August 3, 2016, Mr. Kafarski verbally committed that Aactron will mail a permit to install application no later than Friday, August 12, 2016, and that the application will be received by the AQD permit section in Lansing no later than Wednesday, August 17, 2016. The PTI application was received in a timely manner by the AQD during the week of August 15, 2016.

During a previous inspection on January 28, 2015, I had observed Aactron had recently purchased, and was in the process of installing, a used phosphate metal surface treatment line. As of August 3, 2016, the new phosphate line was installed and individual tanks were undergoing leak testing. The newly installed phosphate line is automated and will be more efficient. Per Mr. Wroblewski it remains to be determined if the existing phosphate line will be removed after the new phosphate line is installed because the original phosphate line can handle larger items. In either case, both phosphate metal surface treatment lines appear to be exempt from the R 336.1201(1) requirement to obtain an approved air use permit to install per R 336.1285(r). All phosphate and alodine (non-ferrous surface treatment) processes have been identified in the PTI application.

Aactron has one natural gas-fired boiler that is used to provide heat for the phosphate coating lines. This boiler has a heat input rating of 4,164,000 Btu/hr. This boiler is for service water

heating, which appears to be exempt from the permit requirements of R 336.1201(1) per R 336.1282(b)(i). This natural gas-fired boiler also appears to be exempt from 40 CFR Part 63 Subpart JJJJJJ (*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*) per §63.11195(e) and per the definition of a gas-fired boiler as defined in §63.11237.

I observed each coating line. The chain-on-edge coating line, which consists of two adjacent spray booths, is used on a limited basis to keep it in good working order. The chain-on-edge coating line was not operating during this inspection. I observed that the particulate filters were clean and properly installed.

I observed the two dip-spin coating lines in operation. These coating lines do not have dedicated exhausts and do not require particulate emission control.

I observed stand-alone spray booths nos. 1, 2 and 3. All appeared to have properly installed particulate filters.

I also observed three curing ovens, one overhead curing oven and one parts drying oven that is used to dry parts after the phosphate line. All ovens associated with the spray booths are included in the general surface coating permit to install. The natural gas-fired oven used to dry parts after the phosphate surface treatment appears to be exempt from R201 per R281 (e). The R281(e) exemption appears valid because the parts leaving the phosphate surface treatment line are thoroughly rinsed with water and therefore air contaminants are not expected to be released during the drying process.

The paint room is located on the north side of the building. I observed the Bananza air makeup unit located outside and adjacent to the west wall of the paint room. The air makeup system can provide filtered ambient air or heated and filtered ambient air. The air makeup system is used to makeup air exhausted by the coating line exhausts and provides improved quality control by managing temperature and humidity.

It is important to note that Aactron has three exhaust fans that are located on the south exterior wall of the building. These three exhaust fans are adjacent to the original phosphate line (see photos); a second phosphate line was installed in 2015 and is adjacent to the north side of the original phosphate line. Mr. Kafarski and Mr. Wroblewski stated that the three exhaust fans were installed to draw air through the building interior from the paint room past ovens, past a boiler and past the phosphate line to provide comfort ventilation. Mr. Kafarski and Mr. Wroblewski stated that the exhaust fans were not needed to operate the phosphate coating lines. Mr. Kafarski and Mr. Wroblewski stated that the exhaust fans were installed many years after the first phosphate line was installed and the exhaust fans do not have to operate for the phosphate line to operate. Mr. Wroblewski showed me the control panel for the exhaust fans and demonstrated how he can control each fan speed. Mr. Wroblewski stated that the exhaust fan speeds are reduced in the winter. Mr. Wroblewski also stated that the fan controller turns off the exhaust fans overnight during set times when the building is not occupied. Mr. Kafarski and Mr. Wroblewski stated that the exhaust fans were installed to work in coordination with the Bananza air makeup system where the air makeup system pushes air into the building and the exhaust fans pull air out of the building.

The concern as to whether or not the three exhaust fans are exempt from Rule 201 was discussed during this inspection. Per this inspection, it remains undetermined whether or not the exhaust fans are exempt from Rule 201 per Rule 285(l)(iii) because the exhaust system

does not exclusively serve the phosphate line. It remains to be determined if the Rule 280(b) exemption from Rule 201 applies because the exhaust system may remove air contaminants from the phosphate surface treatment lines. The exhaust fans have been identified in Aactron's HAPs opt-out permit to install application. I shall work towards a compliance determination with input from coworkers, the permit engineer and my supervisor.

During this inspection I collected permit required material use and emission records. The records I requested covered 24 months from July 2014 through June 2016. The records appear to demonstrate compliance with the VOC emission limits specified in PTI No. 170-02. The calculated HAP emissions appear to be less than 50% of major threshold for both individual HAPs and aggregate HAPs, which appears to demonstrate compliance with R208a registration.

Per conversations with Mr. Kafarski and the AQD permit section during the first week of August 2016, it appears that a synthetic minor HAPs opt-out permit may be the best option for Aactron. Therefore, Mr. Kafarski has decided to apply for a HAPs opt-out permit and retain the active general surface coating permit. On Monday, August 15, 2016, the AQD received an email from Mr. Kafarski in which he wrote, "PTI application has been UPS'd to Lansing and is due there tomorrow. Thank you for all your help and encouragement." Therefore, it appears that the AQD will be able to log the receipt of the HAPs opt-out PTI application and proceed with the review in a timely manner before Rule 280a is rescinded. It should also be noted that if the applicant has not provided sufficient information with the permit application or if the applicant fails to provide requested information in a timely manner then the permit application may be returned to Aactron and the company would then face the potential being in violation of when Rule 208a is rescinded.

Conclusion

As of the date of this activity report, Aactron Inc. appears to be in compliance with all evaluated permit conditions and air pollution control rules. The evaluation of the exempt status of the three exhaust fans is pending the HAPs opt-out permit approval.

Image 1(20160803_113311_Mari) : Complete image name is: 20160803_113311_Marie Lane. View of Aactron south wall exterior showing three exhaust fans.

Image 2(20160803_114045_Mari) : Full image name is: 20160803_114045_Marie Lane. View of phosphate line adjacent to south exterior wall. This view shows the west most exhaust fan.

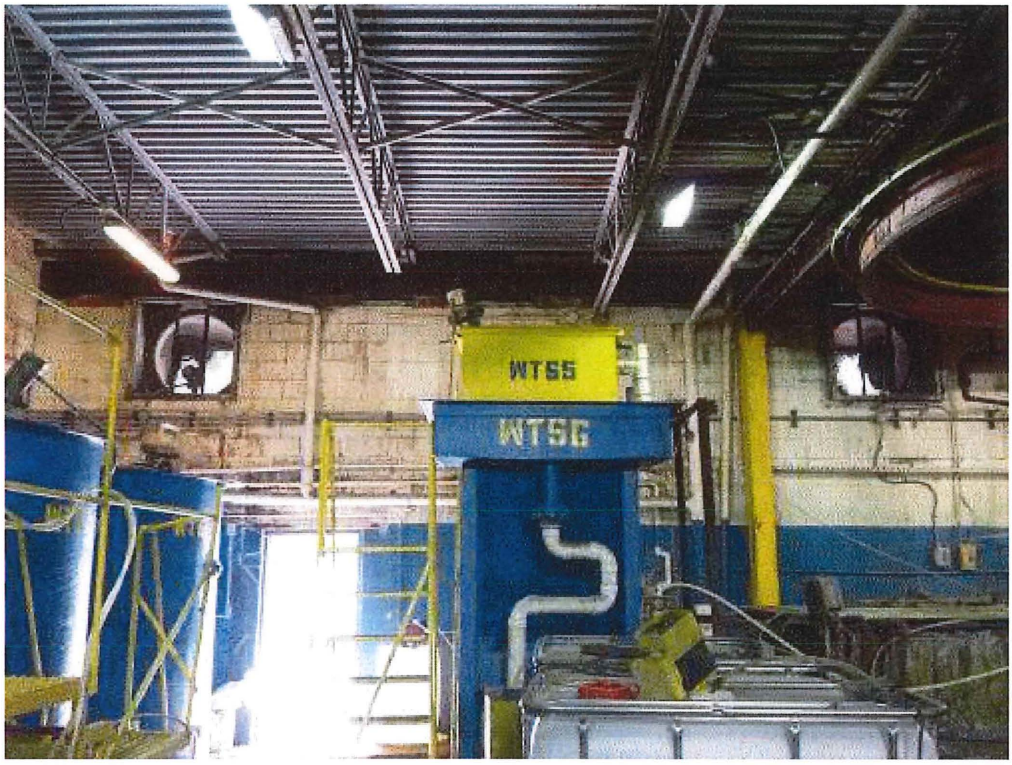

Image 3(20160803_122247_Step) : Full image name is: 20160803_122247_Stephenson Highway. View of center and east exhaust fan. Note: center fan is over phosphate line. East exhaust fan is not located directly over phosphate line.

NAME Robert Edmonds DATE 9/6/16 SUPERVISOR Joyce