

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

N326723812

FACILITY: DAPCO INDUSTRIES		SRN / ID: N3267
LOCATION: 2500 BISHOP CIRCLE EAST, DEXTER		DISTRICT: Jackson
CITY: DEXTER		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 12/05/2013
STAFF: Glen Erickson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection with HR Manager Julie Koch.		
RESOLVED COMPLAINTS:		

Scheduled inspection with HR Manager Julie Koch, 734-426-8900 x 336. Also spoke with Roy McCall, degreasing dept. supervisor.

Main source of regulated air emissions at this facility is the methylene chloride vapor degreaser, which is covered by PTI No. 470-97. This permit is a synthetic minor opt-out permit limiting methylene chloride emissions to 9.5 tpy, and 1,716 gal./yr. Methylene chloride is a regulated HAP.

PTI No. 470-97 incorporates the requirements of the federal solvent cleaning NESHAP, 40 CFR, Part 63, Subpart T. DAPCO operates an open top vapor degreaser with an enclosed design with a solvent/vapor interface of greater than 13 sq. ft. This degreaser complies with the NESHAP by complying with Option No. 4 which requires:

1. Freeboard ration > 1.0.
2. Superheated vapor zone.
3. Reduced room draft.

The most recent methylene chloride usage and emissions show 990 gals. over the last 12-months rolling time period ending Oct. 2013 compared to permit limit of 1,716 gals./12-mo rolling. Emissions = 4.3 tpy, compared to permit limit of 9.5 tpy.

Vapor zone temperature is measured and recorded prior to first shift. Today's temperature = 142 deg. F. @ 6:30 am.

Degreaser has a dedicated water chiller to provide chilled water to the cooling coils above the vapor zone. The manufacturer's recommended high temperature of the outlet water from the coils is 51 deg. F and is now programmed into the degreaser's computer controller. Most parts are tumbled in baskets with a closed top and screened sides to allow the vapor to properly clean all of the small parts in the baskets. Many of the parts have blind holes and cavities in which the vapor pools and would lead to drag out if the parts were not left to dry within the unit before exiting. Some of the brass parts have soft threads that prevents them from being tumbled, so instead they are left within the vapor zone for an extended time for complete cleaning, followed by an extended drying time.

The degreaser is coupled to a solvent still such that the degreaser fluid is cycled on a continuous basis from the degreaser to the solvent still where it is cleaned. Every 2 weeks the solvent still is taken off-line for 1-2 days for a "boil down" to help remove solids from the liquid. The slurry is drained to barrels for off-site waste recycling. The recycler, Parts Cleaning Tech reported the last waste was recycled to produce 8% reclamation of clean methylene chloride from the waste slurry. This reclamation figure is off-set in the material mass balance calculations for determining the methylene chloride emissions that come from the facility. Most recent waste shipment was in Oct. 2013 of 110 gal.

Company operates a small cylindrical screw conveyor cold cleaner using mineral spirits to remove the majority of the metal shavings from the parts that are to be degreased.

Observed a small pot furnace melting clean zinc bars for use in a machine called a Techmire which forms a zinc nut on the middle of a metal spindle. No VEs. Permit exempt via Rule 282(a)(iv) or (vi).

Company has a small 10 year-old Vanguard model gasoline-fired emergency generator of 7.5 HP. This unit is not installed, it is a portable generator. Not certain if it is subject to Part 63, Subpart ZZZZ since it is not installed. Is not required to have a permit to install since it is not installed, as well as, far less than 10 MMBTU/hr heat input.

Facility appears in full compliance with all air regulations and permit conditions at this time.

NAME GHEN ERICKSON

DATE 12-10-13

SUPERVISOR 