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

A096839266

FACILITY: VON WEISE USA, INC		**SRN / ID:** A0968
LOCATION: 402 E HAVEN ST, EATON RAPIDS		**DISTRICT:** Lansing
CITY: EATON RAPIDS		**COUNTY:** EATON
CONTACT: Robert Pierce , Engineering & Operations Manager		**ACTIVITY DATE:** 02/22/2017
STAFF: Michelle Luplow	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Unannounced self-initiated inspection		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (
Other AQD Staff Present: Sue Thelen, Permits Section

Personnel Present: Robert Pierce, Engineering and Operations Manager (Robert.pierce@vonweise.com)
Kevin Hein, President (kevin.hein@vonweise.com)
Scott Abright, Purchasing Manager (scott.abright@vonweise.com)

Other Personnel: Paul Sterkenburg, Consultant ERM

Purpose:
Conduct an unannounced self-initiated compliance inspection of Von Weise, to determine, at least in part, the history of the facility with respect to Fasco and Eaton Technologies, which share addresses with Von Weise, in addition to SRNs. The last inspection here was conducted in 2012.

Facility Background:
Robert Pierce explained the history of Von Weise to S. Thelen and I. Fasco Motors owned this location in addition to 450 Marilin and 770 Jackson St through 2007. In December 2007 Von Weise took ownership of these 2 locations in addition to 402 E. Haven St. in September 2007 (i.e. Fasco sold these locations on Marilin St and Jackson St). Previous to Fasco Motors' ownership, in1995 Eaton Technologies (pre-1995 used to be Eaton Stamping) owned all 3 buildings.

Currently the 3 locales are operated under 3 separate SRN's, each under separate ownership:

SRN N2363 is associated with 450 Marilin Street, which is currently Precision Prototype
SRN A0968 is associated with 402 E Haven Street, Von Weise
SRN N3439 is associated with 770 Jackson St, which is currently Automation Precision Equipment

Von Weise produces products for multiple industries: NKJ Precision Air Measurement (PMAS) – air flow sensor assembly and calibration, production and testing of the starter armatures for lawn and garden equipment, and pool lift assembly.

R. Pierce informed me that remediation efforts have ensued on Von Weise's property to clean up historical contamination of chlorinated compounds. He said remediation efforts have been occurring for approximately 4 years. I spoke with Rebecca Taylor, the Project Manager for this site from the Remediation and Redevelopment Division (RRD), who said remediation efforts have been occurring for approximately 4 years also, and provided me with contact information for Paul Sterkenburg, the Project Manager from Environmental Resources Management (ERM), a consulting firm. P. Sterkenburg said that the air effluent is not treated. According to the NJ Department of Environmental Protection, sub-slab depressurization systems consist of PVC piping installed through a slab floor and a fan connected to the piping. When the system is running, the fan applies a vacuum beneath the slab and vapors in the soil beneath the building are emitted to the ambient air.

Inspection:
Sue Thelen and I arrived at Von Weise at approximately 10:30 a.m. February 22, 2017 and met with Robert Pierce, Kevin Hein, and Scott Abright. I provided Robert Pierce with a January 2017 Permit to Install exemptions handbook, and explained that the handbook discusses all emission units that do not require an air permit to install. The following table lists all current exempt equipment. There is no permitted equipment at this facility.

Emission Unit Description	Exemption
Sub-slab Depressurization Remediation System	Rule 290 (pre-December 2016 rules) Discussion below
Armature Varnisher with Electric Cure Oven	Rule 290(2)(a)(ii)(B) Discussion below

Electric screw guns; Emissions released only to general in-plant environment	Rule 285(2)(l)(vi)(B)
Lathes; Emissions released only to general in-plant environment	Rule 285(2)(l)(vi)(B)
Plastic cutting; Emissions released only to general in-plant environment	Rule 285(2)(l)(vi)(B)
Spot welding with local ventilation	Rule 285(2)(i)
Pneumatic Presses for wire	Rule 285(2)(l)(i)
Electrically heated oven to shrink plastic crimps onto wire	Rule 282(2)(a)(i)
Parts Washer serviced by safety kleen, with "Armaclean" cleaning solution. Air:vapor interface 8 ft^2. Operating instructions located on unit. VOC at10% solution is less than 3% by weight	Rule 281(2)(k)
Spray Foam – to make shipping foam tailored to fit Von Weise parts for shipping out to customers. Component A and B react to form foam parts	Rule 286(2)(e)

The following equipment listed in the previous inspection report has either been decommissioned or removed from the facility: the seven-stage parts washer; powdercoat booth and its associated oven; resistance welders, alkaline parts washer; and dry-off oven.

Exemption Discussion

Ethylbenzene (IRSL 0.4 $\mu g/m^3$) and styrene (IRSL 2 $\mu g/m^3$) are the two components of the Pedigree 600 S varnish to be analyzed under Rule 290(2)(a)(ii)(B). Both carcinogens are greater than 0.04 $\mu g/m^3$ falling into the Rule 290(a)(ii)(B) category. Attached is VonWeise's exemption demonstration. Based on the past 7 months of work, R. Pierce chose the month with the highest production on the varnisher as a worst-case scenario of the number of parts produced on the equipment. The total combined emissions of ethylbenzene and styrene were 5.71 lbs for that month. Therefore, all other months with lower production rates than 602 parts would also be in compliance with the 20 lb/month uncontrolled emission limit in Rule 290. I will remind R. Pierce that monthly emissions calculations should be conducted in order to demonstrate compliance with Rule 290 for future compliance inspections.

The sub-slab depressurization remediation being conducted on VonWeise's site has also been pursued under Rule 290. P. Sterkenburg provided me with January 2015 – March 2017 monthly emissions data to demonstrate compliance with the "old" (pre December 20, 2016) Rule 290 exemption. Five non-carcinogenic VOC's and 1 carcinogenic VOC are detected in the depressurization effluent stream. VonWeise is limited to 1000 lbs of the noncarcinogenic VOC's and 20 lbs of carcinogenic contaminants per month. During this time period, the highest carcinogenic emissions per month was 1.56 lbs, and the highest noncarcinogenic VOC emissions per month was 1.84 lbs. Both limits are being met. Snap-shot spreadsheets of these calculations are attached. Collectively, between the varnisher equipment emissions and the remediation project, emissions of carcinogenic compounds as well as noncarcinogenic VOCs, are less than 20 lbs/month

Von Weise is in compliance with the state's exemption rules at this time.

NAME Melissa Ingram DATE 5/3/17 SUPERVISOR B. M.