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

| A209842914 | | |
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| FACILITY: Sapa Aluminum | | SRN / ID: A2098 |
| LOCATION: 5575 N RIVERVIEW, PARCHMENT | | DISTRICT: Kalamazoo |
| CITY: PARCHMENT | | COUNTY: KALAMAZOO |
| CONTACT: Paul Southwick , Maintenance Manager | | ACTIVITY DATE: 12/14/2017 |
| STAFF: Monica Brothers | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Unannounced schedu | Iled inspection | |
| RESOLVED COMPLAINTS: | | |

This was an unannounced scheduled inspection. I arrived at the facility at 1:00pm. I did not smell any odors or see any opacity while pulling up to the building. Once in the reception area, I tried to call Chad Boelman, who was the EHS Manager during the last complaint investigation in 2014, but he no longer works there. I eventually got in contact with Paul Southwick, the Maintenance Manager. He said that they were in the process of replacing Chad's EHS position, and that in the meantime, he would be the best person with whom to do the inspection. He led me to his office where I asked him a few initial questions about the facility. The facility is no longer Sapa. It is now officially part of Hydro again. They make aluminum parts, of which about 30% is for making exercise equipment, and they operate 24 hours a day, seven days a week.

They have an aluminum extruder that forms the hot metal to the desired shape. It is a 5.4 MMBTU/hr, natural gas unit that can be considered exempt under Rule 285(2)(k). During the inspection tour, the extruder was operating at about 3,754 lbs/hr. They also have two natural gas-fired ovens, one for tempering, and the other for aging. The tempering oven is a 2.2 MMBTU/hr unit and was operating at 349°F at the time of inspection. The aging oven is a 0.3 MMBTU/hr unit and was operating at 343°F. Both ovens can be considered exempt under Rule 282(2)(a)(i).

They have many machines to shape and alter the aluminum parts. They have 23 punch presses, 10 saws, 22 CNC machines, a sanding area, and a woodworking area. Each of these things can be considered exempt under Rule 285(2)(I)(vi). There are three baghouses associated with this equipment that vent externally. There is one for the sanding area, another for the saws, and the other for the woodworking area. The rest of the machines vent internally. Paul showed me the three externally-vented baghouses, which contain cartridge filters. He said that they have a maintenance plan that they follow for monthly checks on the filters. It looked clean around the baghouses. There is also a welding area, which can be considered exempt under Rule 285(2)(i).

They have an area where they use caustic to clean the aluminum out of the steel dies. This is an entirely enclosed system that feeds the caustic into a closed tank and pumps it to another tank for storage after it can no longer be used. There is a tank to hold the usable caustic, a process tank, and a tank to hold spent caustic. Because this system is vented internally, it can be considered exempt under Rule 285(2) (r)(iv). The spent caustic is hauled away by Kcom Environmental. Paul gave me the SDS for the caustic, as well as documentation of their caustic usage by month, which are attached to this report. In the same area, there is also a bead-blaster that is used after the caustic to polish the parts. It is also internally vented.

They have one very small boiler at the facility. It is an 800,000 BTU/hr Lochinvar Knight XL, natural gas unit that is used to heat the sidewalks so that the snow doesn't accumulate on them. It can be considered exempt under Rule 282(2)(b)(i). They also have one parts washer in the maintenance area. It is a CRC SmartWasher that uses non-voc fluid. It is not considered a cold cleaner because of the very low VOC content. The SDS is attached to this report. Paul also gave me their latest boiler inspection report and a chart of their natural gas usage since 2009. Both are also attached.

After the tour, I thanked Paul for his time and left the facility at about 2:30pm. The facility seemed to be in compliance at the time of inspection.

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DATE 1/3/18 SUPERVISOR MQ 1/5 2018