

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

A220833697

FACILITY: BULMAN PRODUCTS INC	SRN / ID: A2208
LOCATION: 1650 MCREYNOLDS NW, GRAND RAPIDS	DISTRICT: Grand Rapids
CITY: GRAND RAPIDS	COUNTY: KENT
CONTACT: Nils Reichert , Plant Manager	ACTIVITY DATE: 03/14/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance
	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to determine compliance with all State and Federal Air Quality Rules and Regulations, particularly 40 CFR Part 63 Subpart T for Halogenated Solvent Cleaners.	
RESOLVED COMPLAINTS:	

On Monday March 14, 2016 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Bulman Products, Inc. located at 1650 McReynolds St. NW, Grand Rapids, Michigan. The purpose of this inspection was to determine compliance with all applicable State and Federal Air Quality Rules and Regulations, particularly 40 CFR Part 63 Subpart T for Halogenated Solvent Cleaners.

KD arrived at the facility at approximately 1:45 pm and observed the facility for odors and opacity prior to entering the facility. None were observed. KD met with Mr. Nils Reichert, Plant Manager, and presented him with the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. KD left the facility at approximately 2:30 pm.

Facility Description:

Bulman Products, Inc. (Bulman) manufactures large paper roll dispensers, primarily for schools. The roll dispensers are made of metal; Bulman does not process any plastic parts. Bulman's operations include stamping, welding, and machining of metal, followed by a cold solvent batch vapor degreaser, a powder coating line and associated oven. Other miscellaneous packaging operations are also found within the facility. Bulman employs approximately 25 employees, and operates one (1) eight-hour shift per day, five (5) days per week.

Regulatory Overview:

Bulman voided Permit to Install (PTI) No. 701-90 in 2008 after it switched from solvent coating to powder coating operations. Thus, aside from the various exempt emission units, Bulman is only subject to Federal Regulation 40 CFR Part 63 Subpart T for Halogenated Solvent Cleaners. The batch vapor degreasing unit is not subject to Rule 707 because Rule 707(5) indicates that this rule does not apply to any cleaners that are subject to Subpart T.

Per Mr. Reichert, Bulman is considering installing some new equipment that would replace the existing vapor degreaser, which currently utilizes Trichloroethylene, to a unit no longer make Bulman subject to Subpart T. KD suggested that Mr. Reichert be in contact with AQD to ensure there are no permitting issues with the potential installation of new equipment.

Compliance Evaluation:

Mr. Reichert gave KD a tour of the facility, which started with several of the machining, welding, and stamping operations. All of these operations are exempt from Rule 201 permitting under Rule 285 (l)(vi), Rule 285 (i), and Rule 285 (l)(i), respectively.

After the parts are made, the parts are cleaned in the vapor degreaser. The vapor degreaser uses Trichloroethylene (MSDS attached) as the solvent. MDEQ is a delegated authority for 40 CFR Part 63 Subpart T for Halogenated Solvent Cleaners, and per Mr. Reichert, this unit has not changed since AQD's last inspection. The unit was installed in 1987, and Bulman submitted a compliance notification in 1998.

The 15 sq. ft. (3 x 5) cold batch unit was closed at the time of the inspection, with the exception of when the unit was measured, in order to verify the air/solvent interface. The solvent/air interface of 15 sq.ft. means that the unit shall comply with an idling emission limit of 0.045 pounds per hour per square foot of solvent/air interface. This unit conducted the required emission testing in 1998 and reported an idling emission rate of 0.019 lb/hr/sq. ft. solvent/air interface, which is below the compliance limit. Bulman also utilizes a freeboard refrigeration system, with a freeboard ratio of at least 1.0, working-mode (bi-parting) cover, reduced room draft and dwell in

order to comply with the emission limits.

Usage records (reviewed on site) indicate that a total of nine 55-gallon drums was used in all of 2015. This equates to a total usage of less than 50 gallons per month. Bulman does recycle some of the solvent through a closed loop recycle tank. Bulman is required to submit semi-annual exceedances reports. Upon investigation, it appears that Bulman has not submitted the required report since 2011. Per Mr. Reichert, he was likely mistaken about the need for submitting that report. Mr. Reichert thought that this report was no longer needed, however that was incorrect. Mr. Reichert had usage records available, so was able to quickly gather these compliance reports. No exceedances were reported from the time frame of 2012 through 2015. However, a Violation Notice will be issued for the late submittal of these required exceedances reports.

Bulman also utilizes two (2) powder coating booths. One of the booths is very small, and is only used for touch up and special projects. This booth was properly equipped with a filter at the time of the inspection. The other booth, is a larger booth with an associated oven. This booth also had a functioning fabric filter associated with it. The powder coating booths, and associated oven, is exempt from Rule 201 permitting under rule 287 (d). Bulman also tries to recycle and reclaim as much powder as possible.

Lastly, Bulman does not have any cold cleaners, boilers, or emergency generators.

Compliance Determination:

Based on the observations made during the inspection and a subsequent review of the records, Bulman Products, Inc. is not in compliance with all applicable Air Quality Rules and Regulations. A Violation Notice will be issued for the failure to submit the exceedances report as specified in 40 CFR Part 63 Subpart T. 63.468 (h).

NAME Kaitlyn D. Davis DATE 3/28/16 SUPERVISOR PMB