

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

A220845697

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: 08/20/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Bulman Products, Inc. (BP) facility at 10:24am on August 20, 2018, to complete a scheduled unannounced inspection.

Facility Description

Prior to entering the facility, off-site odor and visible emission observations were completed. The weather conditions were low 70's F, partly cloudy and winds from the east/southeast at 5-10mph. A cleaning material odor was noted on the western boundary; however, this appears to have been from the personnel working on the roof of the building and it was concluded to not be of concern. No visible emissions were noted.

Upon arrival, AQD staff AS met with Mr. Nils Reichert, Plant Manager/Purchasing, who provided a tour of the facility, answered site specific questions and provided requested records.

BP is a manufacturing company of various paper cutters, dispensers and racks for paper products. The facility is in operation with one Opt-Out Permit to Install (PTI) No. 28-17 and is a synthetic minor source for hazardous air pollutants (HAPs). The facility is in operation with a batch vapor solvent cleaning machine that is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T – National Emission Standards for Halogenated Solvent Cleaning. Additional information regarding the applicable requirements for this unit will be discussed further in this report.

Notable changes since the March 2016 inspection were the installation of a new vapor degreaser and the switching of solvent materials in the second cleaning machine on site. No additional significant changes have occurred to the facility since then.

Following the inspection, Air Quality Compliance Assistance Specialist Jenifer Dixon, with the Office of Public Affairs and Outreach assisted BP staff in compiling records to adequately demonstrate compliance.

Compliance Evaluation

EUEZGDEGREASER

This emission unit is for the batch vapor solvent cleaning machine that uses trichloroethylene in a concentration greater than 5 percent by weight as a cleaning and/or drying agent. The machine is used to clean metal parts before powder coating.

This cleaning machine is referenced in several documents as Model EZ-s 533. This unit is subject to the NESHAP Subpart T federal regulations and complies with this through the alternate standards in 63.464. The required monitoring and recordkeeping associated with the alternate standards is discussed further below. Reviewing the NESHAP Subpart T rules, no applicable work practice standards appear to be required for the Model EZ-s 533 cleaning machine.

The Model EZ-s 533 cleaning machine was observed during the course of the inspection. During operation two automatic doors on the top of the cleaning machine open and the parts to be washed are lowered into the unit before the doors are closed. One spray apparatus was observed within the unit that is used for agitation and spraying metal parts during cleaning. The grating observed within the cleaning machine was concluded to be the fill line for when adding solvents.

The EUEZGDEGREASER is subject to a trichloroethylene (CAS No. 79-01-6) emission limit of 831 lbs per a 3-month rolling average. Monthly emission records were requested and provided. For the 3-month average of June, July and August 2018, the 3-month average was 478.75 lbs, which is well within the permitted limit. Previous 3-month averages were also well within the permitted limits.

BP staff verified that only clean liquid solvent is added to the cleaning machine. Per Special Condition (SC).VI.1.a, records of dates and amounts of solvents added to the cleaning machine shall be recorded. Records of dates and solvent amounts added were provided back to April 2017. Based on the records reviewed, BP is adequately keeping track of solvent additions to the cleaning machine.

Per SC.VI.1.b, BP shall determine the solvent composition of wastes removed from the cleaning machine. BP staff stated that the cleaning machine has only been cleaned once since starting operation and that was on June 27, 2018. A waste manifest for 2018 was provided showing how many gallons of trichloroethylene was removed. Moving forward, BP shall adequately identify the solvent composition of the waste removed offsite from the cleaning machine.

Per SC.VII.1.a-d, there are several reporting requirements for EUEZGDEGREASER. Additional information regarding these items is discussed below.

- Initial Notification Report – The Initial Notification Report was submitted and received by the AQD on April 10, 2017.
- Initial Statement of Compliance – The Initial Statement of Compliance Report was requested and received by AQD staff on September 24, 2018. Errors were identified in the report; however, it was concluded to be acceptable by AQD staff AS.
- Solvent Emission Report – The Solvent Emission Report that appears to be for 2017 was requested and provided to AQD staff on September 18, 2018. The report was deemed acceptable with corrections noted. Moving forward, in future Solvent Emission Reports BP shall correctly report 3-month rolling average emissions and include 12-month rolling total emissions.
- Exceedance Reports – Exceedance Reports for 2017 and the first half of 2018 were provided by BP staff. No exceedances were reported during those time

frames.

No stacks are listed in association with this emission unit and emissions appeared to be discharged into ambient air.

FGFACILITY

This emission unit is for all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

BP is subject to a source wide limit for trichloroethylene (CAS No. 79-01-6) of 31,085 lbs which is approximately 15.5 tons per a 12-month rolling total. Monthly emissions back to April 2017 were provided. For the month of August 2018, 0.09 tons of trichloroethylene were emitted and the 12-month rolling total for August 2018 was 1.73 tons of trichloroethylene emissions, which is well within the permitted limit. Previous 12-month rolling totals were reviewed and concluded to also be well within the permitted limit.

BP is subject to a limit of less than 8.9 tons per year (tpy) for individual HAPs and a limit of less than 22.4 tpy for aggregate HAPs per a 12-month rolling total. Besides trichloroethylene, the remaining individual HAP emitted from the site is 1,2 Epoxy-Butane, which is from the second cleaning machine (Detrex Model VS-800-EE) on site. Additional information regarding this cleaning machine is discussed further below in this report. For the month of August 2018, 3.74 lbs of 1,2 Epoxy Butane was emitted and the 12-month rolling total as of August 2018 is 45.48 lbs, which is well within the permitted limit. For the month of August 2018, 0.09 tons of aggregate HAPS was emitted and the 12-month rolling total as of August 2018 was 1.75 tpy, which is well within the permitted limit. Previous 12-month rolling totals for all individual and aggregate HAPs were reviewed and concluded to be within permitted limits.

Per SC.V.1, BP shall use formulation data sheets when determining the HAP content for each material. A Material Safety Data Sheet (MSDS) and Technical Data Sheet were provided for the N Propyl Bromide material used in the Detrex Model VS-800-EE cleaning machine. BP is using a worst case scenario from the MSDS to calculate 1,2 Epoxy-Butane emissions. It was concluded by AQD staff AS and District Supervisor Heidi Hollenbach that based on how low the 1,2 Epoxy Bromide emissions are from the N Propyl Bromide, if manufacturers formulation data sheets are available, then BP shall use them in verifying the hap content. If manufacturers formulation data sheets are not available, then using the worst case scenario to determine HAP emissions is acceptable. In the future, if HAP emissions increase significantly, then the conclusion will be reassessed.

No reclaim of tetrachloroethylene is completed on site. In the records provided, BP identifies the cleanouts that occur for the Detrex Model VS-800-EE using the N Propyl Bromide and is keeping track of liquids removed from the unit that are then subtracted from the monthly emissions. After further review this was concluded to be acceptable at this time. BP appears to be keeping adequate track of usage rates, HAP contents, and monthly/12-month rolling total emissions.

Records from April 2017 through August 2017 were provided and reviewed for the Detrex Model VS-800-EE cleaning machine when it was still in operation with trichloroethylene. After further review, the records appear to be acceptable at this time.

Additional Observations

- The Detrex Model VS-800-EE cleaning machine was observed during the site inspection. This unit was formerly subject to the federal NESHAP Subpart T regulations. In September 2017, the company switched the cleaning machine from using trichloroethylene to N Propyl Bromide. Based on the usage of N Propyl Bromide in the Detrex Model VS-800-EE, this unit is no longer subject to the NESHAP Subpart T regulations. Reviewing previous documents, it appears that the unit was originally exempt from permitting per grandfathered Rule 285(o) (iv), which exempts degreasers and cold cleaners from Rule 201 whose emissions are only released into the general in-plant environment. This exemption is now identified as Rule 285(2)(r)(iv), and after further review appears to be applicable.
- Various metal fabrication machines were observed during the inspection. The machines observed appear to be exempt per Rule 285(2)(l)(i) or Rule 285(2)(l)(vi) (B).
- A welding area was observed that appeared to be exempt per Rule 285(2)(i).
- Two powder coating booths and associated ovens were observed during the course of the inspection. One booth was an automatic application and the second booth was a hand application. Filters are replaced as needed. The powder coating booths and associated ovens appear to be exempt per Rule 287 (2)(d).

Conclusion

Based on the facility walkthrough, observations made, and records received, BP appears to be in compliance with PTI No. 28-17, the NESHAP Subpart T regulations and other applicable air quality rules.

NAME

Adam F. Shaffer

DATE

09/25/18

SUPERVISOR

