DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

A220861717

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:** 12/09/2021
STAFF: Michael Cox	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Michael Cox (MTC) arrived at the Bulman Products, Inc. (BP) facility at approximately 9:00 am on December 9, 2021, to complete a scheduled unannounced inspection. Odor and visible emission observations were made prior to entering the facility. No visible emissions or odors were noted.

Facility Description

Bulman Products, Inc. is a manufacturing company of various paper cutters, paper dispensers and racks for paper products. The facility is in operation with 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 EUEZGDEGREASER, which is a batch vapor solvent cleaning machine that uses trichloroethylene in a concentration greater than 5 percent by weight as a cleaning agent. The machine is used to clean metal parts before powder coating and is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T – National Emission Standards for Halogenated Solvent Cleaning.

Compliance Evaluation:

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

EUEZGDEGREASER

This emission unit is a batch vapor solvent cleaning machine that uses trichloroethylene in a concentration greater than 5 percent by weight as a cleaning agent. The machine is used to clean metal parts before powder coating. EUEZGDEGREASER is subject to the NESHAP Subpart T federal regulations and complies with this through the alternate standards in 40 CFR subpart 63.464. The required monitoring and recordkeeping associated with the alternate standards is discussed further below. NESHAP Subpart T rules does not require any work practice standards for EUEZGDEGREASER.

EUEZGDEGREASER 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. Metal parts are agitated and sprayed once lowered into the unit for cleaning purposes which was observed during the site visit. Solvents within the cleaning machine were noted to be at the fill line.

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 for the time period of November 2020 through November 2021 and were provided. The highest 3-month average rolling emission of trichloroethylene was noted to have occurred during the 3-month rolling period ending in April 2021, when 730.63 lbs of trichloroethylene was emitted.

Mr. Reichert stated 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 reviewed for the time period of November 2020 through November 2021. Based on the review of the records, the facility is adequately keeping track of solvent additions to the cleaning machine.

Per SC.VI.1.b, the facility shall determine the solvent composition of wastes removed from the cleaning machine. Mr. Reichert stated that liquid and solid wastes have not been removed from EUEGZDEGREASER. This was also verified in the records reviewed for the time period of November 2020 through November 2021.

Per SC.VI.2, the facility shall keep records of the cleaning capacity of EUEGZDEGREASER for the lifetime of the machine. The facility has manufacturer's specifications on site denoting the cleaning capacity of the unit.

Per SC.VII.1.a-d, there are several reporting requirements for EUEZGDEGREASER. An Initial Notification was submitted by the facility and received by the AQD Grand Rapids District Office on April 10, 2017. An Initial Statement of Compliance was also submitted by the facility and received by the AQD Grand Rapids District Office on September 24, 2018 and was deemed adequate. The facility is also required to submit annual Solvent Emissions Reports. The most recent annual Solvent Emissions Report was received by the AQD Grand Rapids District Office on January 7, 2022 and was deemed adequate and in compliance. Finally, the facility is required to submit semiannual Exceedance Reports. The most recent semiannual Exceedance Report submittal was received on January 7, 2022 and was deemed adequate and in compliance. Both of these reports were submitted after the site visit on December 9, 2021.

No stacks are listed in association with this emission unit and emissions appeared to be discharged within the facility.

FGFACILITY

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

Bulman Products, Inc. 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. Records of trichloroethylene emissions were requested and reviewed for the time period of November 2020 through November 2021. The highest 12-consecutive month rolling trichloroethylene emissions occurred during the 12-month rolling period ending in July 2021 when 8324.94 lbs of trichloroethylene was emitted. This equates to 4.16 tons of emitted trichloroethylene.

Bulman Products, Inc. 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. Trichloroethylene was the only individual HAP emitted by the facility during the time frame covered by this inspection, therefore trichloroethylene emissions are the same for both individual and aggregate HAP emissions. The highest 12-consecutve month rolling trichloroethylene emissions occurred during the 12-month rolling period ending in July 2021 when 8324.94 lbs of trichloroethylene was emitted. This equates to 4.16 tons of emitted trichloroethylene.

Per SC.V.1, the facility shall use formulation data sheets when determining the HAP content for each material. A Material Safety Data Sheet (MSDS) of trichloroethylene is being kept on site and was reviewed during the site visit. Trichloroethylene was noted to be 12.11 lbs/gal and is consistent with the emissions records provided by the facility.

Additional Observations:

- **Various metal fabrication machines were observed during the inspection. The machines observed appear to be exempt per Rule 285(2)(l)(i) and Rule 285 (2)(l)(vi)(B).**
- **A welding area was observed that appears to be exempt per Rule 285(2)(i).**
- **A powder coating line and associated oven was observed during the inspection. The powder coating line and associated oven appears to be exempt per Rule 287(2)(d).**

Conclusion:

Based on the review of the records provided and the facility walk-through, Bulman Products, Inc. appears to be in compliance with PTI No. 28-17, the NESHAP Subpart T regulations and all other applicable air quality rules.

NAME Michael T. Cox DATE 2/3/2022 SUPERVISOR HH