

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

A267760207

FACILITY: AMERIKAM		SRN / ID: A2677
LOCATION: 1337 JUDD AVE SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Patrick Fitzpatrick , Manufacturing Engineer		ACTIVITY DATE: 08/20/2021
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 facility at approximately 1:00 pm on August 20, 2021, to conduct an unannounced, scheduled inspection. The purpose of this inspection was to determine compliance with applicable air quality rules and regulations. MTC met with Mr. Mike Zolnierek, Director Advanced Manufacturing Engineer.

### Facility Description:

Amerikam is a precision turned metal components manufacturer that provides parts to the automotive, medical, and plumbing industries. A variety of metals are utilized including brass, stainless steel, steel, and aluminum. The metals come in either a rod or block form, which is then processed in any of the various internally vented machining operations on site. After parts are made in the machining process, they have excess oil on them. All chips are spun in a centrifuge to remove and reclaim excess oils. All brass chips are conveyed through an internal trough to the centrifuge for oil removal. Since excess oil is on the parts, the parts need to be cleaned prior to going to the customer.

The facility is permitted pursuant to Opt-out Permit to Install No. 121-05, which provides limitations for Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). The Opt-out PTI was needed to limit the potential emissions from the trichloroethylene vapor degreaser that the facility had operated since the 1980's.

Amerikam has replaced the existing degreaser, due to the toxicity of the trichloroethylene used. In August 2015, the facility installed the new cleaning system as a replacement operation and decommissioned the vapor degreaser, and all trichloroethylene was removed from the site by November 2015. All electrical components to EUDEGREASER have been disconnected from the power source.

The new cleaning emission unit (Roller Cleaner) operates as an enclosed, internally vented system. The parts enter the unit in a rack, and all cleaning solvent is contained in enclosed tanks. The door closes and the rack is vacuumed of all ambient air. Then the heated solvent is introduced to the parts and soaked or spun to remove the residual oils. Then, the rack is again placed under vacuum and the solvent is piped back into the holding tank. The parts are dry upon removal, and no liquid is exposed to the air during the opening of the door. Records of cleaning solvent usage were requested for the time period of January 2020 through August 20, 2021. Based on the review of the records 80 gallons of cleaning solvent was added and used in the new cleaning emission unit during the 2020 calendar year and 35 gallons of cleaning solvent through August 2021. The cleaning solvent used was noted to be Metalnox M6380 which has a VOC content of 7.49 pounds per gallon.

Amerikam has adequately documented that this emission unit is exempt per Rule 285 (2)(r)(iv).

Amerikam is looking into either voiding Opt-out PTI No. 121-05 or modifying the permit to reflect that the emission source EUDEGREASER has been decommissioned and is no longer used by the facility. Several phone conversations with Mr. Patrick Fitzpatrick, Manufacturing Engineer, were held regarding this matter.

**Compliance Evaluation:**

**EUDEGREASER:**

The trichloroethylene vapor degreaser has been decommissioned for over 6 years and as such, there are no emissions or recordkeeping available for this unit.

**FGFACILITY:**

This flexible group limits the facility to 40 tons per year (tpy) VOC per 12-month rolling time period, individual HAP emissions to 8.9 tpy per 12-month rolling time period, and aggregate HAP emissions to 22.5 tpy per 12-month rolling time period. Emission records were requested for the time period of January 2020 through August 20, 2021. After a review of the submitted records, it appears that 389.7 pounds of VOC was emitted by the facility during the 12-consecutive month period ending in August 2021. The records indicated that 0 pounds of individual HAP and aggregate HAPs were emitted by the facility. These emissions are below the 1000-pound limit per emission unit in permit exemption Rule 290(2)(a)(i). A recommendation was made to the facility to contact the AQD Permit Section and request to void Opt-Out PTI No. 121-05 based on emissions.

**Conclusion:**

Due to the vapor degreaser being decommissioned, there are no emissions generated from the use of the trichloroethylene. The facility is keeping track of facility wide VOC and HAP emissions. Based on observations made during the inspection and records reviewed Amerikam appears to be in compliance with Opt-out PTI No. 121-05 and all other State and Federal air quality regulations.

NAME Michael T. Cox

DATE 9/28/2021

SUPERVISOR HH