

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

A422767361

FACILITY: AMERICAN GREASE STICK CO		SRN / ID: A4227
LOCATION: 2651 HOYT, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Dan Brown ,		ACTIVITY DATE: 04/04/2023
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection to assess compliance with air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Introduction

On Tuesday, April 4, 2023, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an on-site inspection of the American Grease Stick facility located at 2651 Hoyt St. in Muskegon Heights, Michigan, to assess compliance with air quality rules and regulations. The facility is a manufacturer of automotive and other industrial lubricant products such as brake fluids and cutting lubricants. The facility has multiple on-site storage tanks, mixing tanks, and packaging processes for these lubricants. The facility also manufactures break lines through various machining processes. This facility has no permits to install and operates entirely on permit exemptions.

Upon arrival at the facility, a brief inspection of the facility perimeter was conducted, during which no odors or visible emissions were observed. SE then entered the facility and was greeted by Manager Dan Brown. A brief discussion over the intentions of the inspection was had and then an inspection of the facility interior was conducted.

Exempt Process Equipment

This facility has a large tank farm where multiple storage and mixing tanks are installed. Tank dimensions and contents are as follows:

- FNO Caster Oil – 10,500 gallons
- Cutting and Grinding Oil – 10,500 gallons
- Naptha 100 – 10,500 gallons
- Nap 500 – 10,500 gallons
- Nap 100 – 10,500 gallons
- Coconut Oil – 10,500 gallons
- Polypropylene Glycol 2000 – 8,600 gallons
- Ethylene Glycol – 8,6000 gallons
- Caustic Potash Liquid – 8,000 gallons
- Brake Fluid – 50-gallon barrels

In 2018, in response to inquiries from the AQD, the facility reviewed and submitted documentation regarding the contents of the various tanks to demonstrate exemption status to permitting requirements. The majority of the stored compounds were found to have vapor pressures below 1.5 psia. These tanks are exempt from air permitting requirements under Rule 284(2)(i). Some tanks contain Naphtha Mineral Spirits, which are not exempt under the same rule as they are considered carcinogenic. These tanks are still exempt under Rule 290(2)(a)(ii) as the annual emissions are below ITSL and IRSI levels, uncontrolled emissions are below 20 lbs./mo., and the vapor pressure is

below 1.5 psia. Some tanks contain coconut oil or castor oil, which are exempt under Rule 284(2)(c) as they are classified as lubricating fuels. Documentation for all applicable compounds and exemptions is maintained within the AQD files and discussion with the facility confirms that no changes in compounds present at the facility have occurred since the documentation was provided. Some tanks have been emptied and are not currently in use, though they are still labeled as previously used and currently there are no intentions to use them in the future.

The facility also has multiple stations for various mixing and transfer operations of the above discussed compounds. This equipment is also exempt from air permitting requirements under Rule 284(2)(i) and Rule 290(2)(a)(ii) for the above discussed requirements. This is based off of past calculations, which were worst case scenario and have not changed since the last evaluation.

The facility manufactures brake lines utilizing various crimping, cutting, and flaring of rubber and metal lines. These processes are all exempt from air permitting requirements under Rule 285(2)(l)(vi).

The facility utilizes one small cold cleaner within the maintenance area that is exempt from air permitting requirements under Rule 281(2)(h).

The facility has one natural gas fired boiler located on site, one rated at 1.4 mmBTU. This boiler is exempt from air permitting requirements under Rule 282(2)(b)(i) as it is rated under 50 mmBTU. This boiler is exempt from New Source Performance Standard 40 CFR Part 60 Subpart Dc as it is rated under 10 mmBTU. It is also exempt from National Emissions Standard for Hazardous Air Pollutants 40 CFR Part 63 Subpart JJJJJ as it is a natural gas fired unit.

The facility has multiple small thermal printers that are used to print black text labels. These units appear to be exempt from air permitting requirements by Rule 285(2)(l)(vii)(B).

Grandfathered Equipment

Multiple process lines at the facility contain equipment that was installed prior to 1967 and so are not subject to permitting requirements as it is considered to be grandfathered equipment. These processes include the tube-filling area and the gallon-container filling area. These areas also only use compounds discussed above regarding permitting exemptions under Rule 284 or Rule 290.

Conclusion

At the end of this inspection the facility appeared to be compliant with all applicable air quality rules and regulations.

NAME Scott Evans

DATE 5/10/2023

SUPERVISOR 