

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other

A936529821


FACILITY: Avon Automotive Cadillac Division		SRN / ID: A9365
LOCATION: 603 West Seventh St., CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT: Tom Haines , Facilities Engineer		ACTIVITY DATE: 06/17/2015
STAFF: Kurt Childs	COMPLIANCE STATUS:	SOURCE CLASS: MAJOR
SUBJECT: Request to remove solvent applicator "knock out" boxes from rubber hose production lines.		
RESOLVED COMPLAINTS:		

On June 10, 2015 the Cadillac District Office of AQD received the attached request for regulatory review of the specified process equipment. Avon Automotive would like to remove this equipment from the process during normal operation and only utilize it during required stack testing events. I discussed this issue with Mr. Tom Haines of Avon Automotive and have reviewed the ROP and past test reports as well as discussing the issue with Mr. Rob Dickman and Tom Gasloli of AQD - TPU and Janis Ransom, Supervisor - Cadillac District.

Due to past difficulties with stack test sampling Avon Automotive installed a "knock out" box in the exhaust stream of each solvent applicator on the rubber hose production lines (FGCADbar and EULINE138). The purpose of the boxes is to allow liquid solvent droplets entrained in gas stream to drop out or volatilize so they can be captured and routed to the RCO for destruction without interfering with sample collection during stack testing. Avon Automotive has requested approval to remove the knock out boxes during normal production and to utilize them only for stack testing events.

My review of the ROP, past stack testing events, and discussions with TPU staff indicate that this is acceptable. The knockout boxes are not required by any condition in the ROP or regulatory standard. Avon Automotive has stated that solvents are not accumulated in or removed from the boxes, the liquids that drop out eventual volatilize and are transported to the RCO through the system ductwork. TPU staff confirmed that removal of the boxes would not affect the capture efficiency of solvent applicator control system. Essentially, the knock out boxes are not integral to the emission control system but act as a gas conditioning component of the sample collection system during testing.

There is potential that, once the boxes are removed, the liquid droplets of solvent will accumulate on the interior of the ductwork and run back to the solvent applicator and or potentially seep from duct work seams but this is a maintenance/housekeeping issue not an air emissions concern.

NAME 

DATE 6-17-15 SUPERVISOR 