

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

B298135736

FACILITY: Wolverine World Wide Inc. - Factory 24B		SRN / ID: B2981
LOCATION: 1005 Baldwin, BIG RAPIDS		DISTRICT: Grand Rapids
CITY: BIG RAPIDS		COUNTY: MECOSTA
CONTACT: Ishmael Rodriguez, EH&S		ACTIVITY DATE: 07/29/2016
STAFF: Steve Lachance	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, Scheduled Inspection (FCE) for FY'016. See CA_B298135736. (SLachance, 7/29/16)		
RESOLVED COMPLAINTS:		

AQD staff SLachance and AShafter conducted an unannounced, scheduled inspection of Wolverine World Wide (WWW) - Factory 24B in Big Rapids, Michigan. The purpose of the inspection was to determine the facility's compliance with Permit to Install (PTI) No. 160-08 and state and federal air pollution regulations. No odors or opacity were noted upon arriving in the facility vicinity at about 9:30 AM, Friday July 29, 2016. Weather conditions were about 75 degrees F, with nearly calm to mild NE winds, and mildly overcast.

FACILITY DESCRIPTION

The facility is a manufacturer of (mostly) military and uniform shoes and boots. The facility manufactures the whole unit, with the minor exception of some soles that are purchased for a few products. Leather arrives at the plant in large sheets, then is cut and assembled into the "upper". A sole is created using one of two plastic injection molding machines and is then attached to the upper. Numerous processes use adhesives and/or stitching to connect materials. The manufacturing process requires the use of multiple indoor dust collector systems and a scavenger cyclonic collector. There are a variety of spray booths for either touching up with paint or adding topcoats to the footwear.

COMPLIANCE EVALUATION

AQD Staff met with Environmental Health and Safety Director Mr. Ismael Rodriguez (ismael.rodriguez@wwwinc.com). Mr. Rodriguez consulted other facility personnel in maintenance, etc. as questions arose.

EUDCPARTICULATE -

Several operations are vented to a rotoclone (cyclone). No testing for this collector has been requested by AQD to date. Many "stations" require removal of excess rubber, leather, etc. by buffing, grinding, cutting, and various other means. The dust is first collected at the station and then further ducted to this "scavenger" control device. As part of the inspection, staff went to the rooftop to observe conditions. No visible emissions were noted (even though the facility is in the midst of a large contract and was very busy with many production stations being utilized), and the roof was "clean", i.e., no material deposition attributable to this device was observed.

This unit is also subject to the Preventative Maintenance Plan weekly, monthly and quarterly requirements of Appendix A to Permit No. 160-08; and these appeared to be addressed by the daily inspection rounds, for which records are maintained. Example attached. Mr. Sipka of Maintenance was very helpful during the discussions this equipment and preventative maintenance activities.

EUWCPARTICULATE- This emission unit/control device has been dismantled and removed from service. Additional machine-specific dry collectors have been installed, and as noted above, these duct to the scavenger cyclone. These changes are considered to be exempt from permitting requirements per Rules 285(l)(vi)(B) {for internally exhausted collectors} and 285(b) {for use of dry cyclone collector as a scavenger for existing production stations.}

FGFACILITY – The entire facility's emissions of HAPs and VOCs are in this group. This consists of emissions from paints, cleaners, mold releases etc.

The permit establishes emission limits of less than 10.0 tpy (as defined by a rolling 13-period time frame, where each "period" is comprised of a 4-week block production period) for individual Hazardous Air Pollutants (HAPs); 25.0 tpy for aggregate HAPs; and 100.0 tpy for VOCs. Compliance with these limits is based on documented shoe/boot production rates; records of materials used and quantities used; documented VOC contents of these materials; and timely maintenance of these records. There are no VOC controls at the facility. All VOCs in materials used are considered to be emitted.

SLachance had reviewed the EI2015 MAERS submittal and substantiating documentation (attached). These demonstrated compliance with production and emission limits per the following:

	Allowed	Reported in EI2015 MAERS
2015 Shoe Production	2,900,000 pairs	818,418
2015 VOC Emissions	100.0 tons	48.6 tons
2015 Highest HAP (Toluene)	10.0 tons	6.0 tons
2015 Aggregate HAPs	25.0 tons	8.71 tons

This indicates that compliance with the individual HAP limit for Toluene will be the compliance pinch-point for operations at the facility. At only 28% of allowed shoe production rate, the facility had emitted 60% of allowed toluene as the highest-emitted HAP.

Mr. Rodriguez demonstrated quick and easy access to current records (attached; current through July 16, 2016), and these demonstrated the same general pattern:

	Allowed	Current Records Indicate
Current Shoe Production	2,900,000 pairs	989,625 pairs
Current VOC Emissions	100.0 tons	74.5 tons
Current Highest HAP (Toluene)	10.0 tons	7.93 tons
Current Aggregate HAPs	25.0 tons	10.66 tons

Mr. Rodriguez was well aware of the fact that rolling-period Toluene emissions were a

potential pinch-point on facility production rates.

Records were found to be in good order and are reconciled against production records (each pair of footwear has a "formula" of materials to be used), internal chemical "stores" records (access to materials is restricted and documented), and waste records. SL asked to see toluene content information for the material from which the majority of toluene is emitted (a Worthen neoprene adhesive.) The facility had previously received AQD approval to use formulation data for records, and Mr. Rodriguez provided the attached Material Safety Data Sheet as documentation. As a material supplied to the military, this material is tightly defined; and the 30.2% content by weight of toluene was confirmed within the spreadsheets for use in calculating emissions. (Consultant Mr. Mike Winchester was teleconferenced into this conversation, which was resolved to SL's satisfaction.)

MISCELLANEOUS- AQD staff reviewed a cold cleaner; this was small enough to be exempt and was observed to be closed while not in use. SL provided the DEQ "cold cleaner stickers" for his use. The cold cleaner does use a more aggressive solvent (methyl ethyl ketone; MEK) than typically encountered; MSDS is attached for this.

AQD staff observed filter placement on several stations and discussed disposal practices. No issues were noted from production stations in use, but an idle station was used to illustrate potential filter installation issues to be aware of (visible gaps, etc.) Spray applicators were not specifically reviewed, but a previous inspection has documented use of HVLP guns, as required by the permit.

AQD reviewed an on-site boiler. The nameplate capacity of this circa 1952 boiler could not be confirmed (physical, it appears to be less than 20 mmBtu/hr heat input capacity), but AQD staff confirmed that it is fueled by natural gas only. The boiler is grandfathered/exempt from permitting requirements. Moreover, as an area source of HAPs, there are no Boiler MACT requirements for this boiler as 40 CFR 63 Subpart JJJJJJ contains no requirements for natural gas boilers.

SUMMARY

SLachance considers the facility to be compliance with applicable air use rules, regulations and permit requirements.

List of Attachments

- Preventative Records/Daily Checklist
- 2015 MAERS Substantiating Records
- Current Emissions Records (through July 16, 2016)
- MSDS - Neoprene Adhesive
- MSDS - Cold cleaner solvent - MEK

NAME



DATE

8/16/16

SUPERVISOR

