

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

B430063883

FACILITY: SAF-HOLLAND, INC.		SRN / ID: B4300
LOCATION: 1950 INDUSTRIAL BOULEVARD, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Craig Scott , Manager		ACTIVITY DATE: 07/19/2022
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection to assess compliance with air quality regulation.		
RESOLVED COMPLAINTS:		

### Introduction

On July 19, 2022, 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 SAF-Holland Inc. facility located at 1950 Industrial Blvd. in Muskegon, Michigan, to assess compliance with the requirements of Permit to Install (PTI) No. 6-02 and all other applicable air quality rules and regulations. SAF-Holland was formerly a manufacturer of truck suspension systems. The facility utilized metal working and coating processes for the production of these suspensions. It was a minor facility for Hazardous Air Pollutants (HAPs). In 2017, the manufacturing processes of the facility were eliminated. The facility now conducts some testing of suspensions using electrically powered hydraulic machines while most of the facility is being converted to office space to be used for engineering staff.

Upon arrival at the facility SE conducted an initial inspection of the facility exterior. There were no noticeable odors or visible emissions observed during this process. After entering the facility, SE was greeted by Craig Scott. A discussion was had during which the change in facility operations was discussed. An inspection of the facility followed this discussion to confirm removal of all equipment included in PTI No. 6-02.

### PTI No. 6-02

PTI No. 6-02 is a minor source permit that includes a single Emission Unit (EU): EU-DIPLINE. This EU is described as containing drain/transfer stage equipment, a drying oven, a cooling station, a paint dip tank, a drain/flash-off staging, a paint stoving oven, and a cooling oven. All equipment included in this emission unit has been removed from the facility.

This EU has two emission limit requirements:

- VOC emissions are limited to 2000 lbs/month for each 12-month rolling time period.
- VOC emissions are limited to 10.0 tons per year (tpy) for each 12-month rolling time period.

These limits are no longer relevant to facility operations as all emissions-producing equipment has been removed.

This EU has one process limit requirement: all waste coatings and reducers shall be captured and disposed of in an appropriate manner. The facility no longer uses or houses coatings or reducers on site so there is no waste in need of storing or disposal.

This EU has one testing requirement, which requires that the facility either conduct method 24 testing to determine VOC content of any coatings or obtain written permissions to use manufacturer formulation data. The facility has received written permission to use manufacturer

data for these coatings. At this time there is no need for reevaluation of this information as the facility is not using any coatings at the facility.

This EU has the following recordkeeping requirements:

- Facility shall maintain a listing of currently in-use coatings and reducers.
- The following monthly records must be kept:
  - Gallons of each coating used.
  - VOC content of each coating.
  - Gallons of each reducer used.
  - VOC content of each reducer.
  - Monthly VOC mass emissions.
  - 12-month rolling annual VOC mass emissions.

All emissions-producing equipment was removed from the facility by the end of the 2017 calendar year. As such, the facility has had no emissions for roughly five years. Historic records could be provided for prior years while the facility was still actively manufacturing suspensions. However, this is unnecessary as the facility has not recently been a production facility nor does it have any plans to return. Much of the facility has been or is in the process of being converted into office space and can no longer serve as manufacturing space.

This EU has three associated stacks. All stacks and associated equipment have been removed. There is presently no equipment present that produce emissions and would require a stack.

#### **Other Items**

This facility has three boilers located at the facility. All are natural gas fired units used only to heat office space. All boilers are exempt from air permitting requirements by Rule 282(2)(b)(i). These boilers are not subject to New Source Performance Standard 40 CFR Part 60 Subpart Dc as they all have a capacity of under 10 mmBTU. These boilers are not subject National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63 Subpart JJJJJ as they are all natural-gas fired units.

The only equipment located at the facility are multiple hydraulic machines used to test suspensions that are produced at other facilities and shipped in. These machines each consist of two hydraulic presses that alternate pressing on either side of the suspension as a means of testing function and durability of the suspensions. These machines are powered electrically and do not produce any significant emissions.

#### **Conclusion**

At the conclusion of the inspection, it could be confirmed that there are no regulated emission sources at the facility. All equipment pertaining to PTI No. 6-02 has been removed and so the PTI is no longer representative of the operations at the facility. The facility has no intention of resuming operations outlined in the PTI and it can be seen that remodels of the facility would not allow such a return to the previously operated processes.

It has been recommended to the facility that they request that the PTI be voided as the significant changes made at the facility would necessitate application for a new permit if they ever do return manufacturing processes to the facility.

NAME Scott Evans

DATE 8/3/2022

SUPERVISOR 