

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

B524326027

FACILITY: HARSCO RAIL		SRN / ID: B5243
LOCATION: 200 S JACKSON RD, LUDINGTON		DISTRICT: Cadillac
CITY: LUDINGTON		COUNTY: MASON
CONTACT: Roger Nash, Plant Manager		ACTIVITY DATE: 07/10/2014
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of this minor source		
RESOLVED COMPLAINTS:		

Inspected this source pursuant to General Permit Number 17-05 and Permit to Install number 269-90. Equipment of interest at this facility includes one small (17-05) and one large (269-90) paint booth, both with dry fabric filter controls. These booths are used to paint metal parts. The representative directing me for the facility was Roger Nash, Plant Manager. At the time of the inspection, neither piece of equipment was in operation.

General Permit 17-05:

This permit is for a small paint booth located inside the main plant and is identified as Booth #1 in the attached records. The general permit contains many conditions which do not apply to the small booth as it only uses dry fabric filter controls, not thermal or catalytic controls. Therefore, following are the findings of the inspection with respect to applicable conditions:

I. Emissions Limits

VOC emission limits at this facility are limited to 2000 pounds per calendar month and 10 tons per year based on a 12-month rolling time period as determined at the end of each month per line. Records reviewed at the facility indicated that the highest monthly VOC emissions were 1450 pounds in February of 2014 and annual emissions from June 2013 to June 2014 were 7.8 tons.

II. Material Limits – No material limits

III. Process Operational Restrictions

The facility is required to store purge/cleanup solvents in closed containers and dispose of them properly. Facility staff were able to demonstrate how these solvents are collected and were able to provide manifests regarding their disposal/recycle.

IV. Design/Equipment Parameters

The facility is required to use HVLP guns or equivalent. All guns noted during the inspection were of this configuration and facility staff noted these were the only type of gun they use.

The facility is required to maintain their dry fabric filters properly. This booth appeared in good repair. The filters used appeared in good repair. Each booth is equipped with a pressure drop indicator that assists in determining when the filters are changed. Filters are changed based on usage and the pressure drop and spent filters are disposed of in a Class II landfill.

V. Testing/Sampling

The facility uses manufacturers formulation data to determine VOC content of the coatings used. They have not changed the manufacturer or formulation of coating since their last inspection in 2012.

VI. Monitoring/Recordkeeping

The following information was confirmed as being kept and available upon request:

- Invoices for coating, reducers, and cleanup solvents
- VOC content of each VOC containing material used
- Amount of each VOC containing material used
- Mass emission calculations for VOC monthly and annually

The facility is required to keep manufacturers composition information for VOC containing materials and this is being performed.

VII. Reporting – there is no reporting associated with this equipment

VIII. Stack Restrictions

The facility is required to have stacks 1.5 times greater than the height of the building. Stacks at the facility appear correct and do not appear to have been recently altered.

IX. Other

The facility shall not modify the process without first notifying the agency. At the time of the inspection, this booth appeared to not have been modified.

At the time of the inspection, this facility appeared in compliance with their General Permit.

Permit Number 269-90

This is a large booth with rails leading in to it. It is capable of housing ^{one} whole assembled machines for coating. Control is through dry fabric filters. Following are the findings of the inspection by Special Condition.

14. Permittee is limited to 240 gallons of paint and or solvent per calendar month. Based on records, the highest usage in any given month during the last 12 months of both coating and solvent is about 100 gallons. The VOC content of all coatings and solvents is required to be kept. Records of this are attached to this report.

15. No visible emissions are allowed from the process. This process was not in operation at the time of the inspection. However, no coatings were noted around the mouth of the stack or on the roof of the booth.

16. The permittee is not allowed to operate this process unless overspray control is employed. This process utilizes HVLP technology and dry fabric filters to control overspray.

17. The permittee is not allowed to substitute any raw materials or solvents for those described in the permit application. There was no easy way to demonstrate compliance with this condition other than the plant manager claims they have not used any different materials in at least the last several years.

18. The VOC emission rate is limited to less than 10 tons per year. In the last 12 months, the facility has emitted 2.4 tons of VOC from this process (June 2013 to June 2014).

At the time of the inspection, this facility was in compliance with their air permitting.

NAME



DATE

7/20/14

SUPERVISOR

