

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

B557828190

FACILITY: Light Metals Corporation		SRN / ID: B5578
LOCATION: 2740 Prairie St SW, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Kevin Kane, Consultant		ACTIVITY DATE: 12/17/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, unscheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, self-initiated inspection and met with Kevin Kane of the Kane Group, Inc. who is a consultant for Light Metals. He was presented with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed. I informed him that the reason for the inspection is that AQD staff observed a yellowish brown plume on November 25th at around 5:00 PM. Mr. Kane indicated with time and date he could look into what was running on the anodizing line that day.

FACILITY DESCRIPTION

This facility manufactures various products out of aluminum for use in multiple industry sectors. This includes items for the appliance, automotive and furniture industries. The aluminum is delivered in billets, then heat treated and extruded. The aluminum is processed with cutting and/or stamping equipment, then anodized.

COMPLIANCE EVALUATION

AQD staff brought a document from 2003 that the facility had submitted that includes air emissions inventory information to use as a guide during the inspection. During the review conducted prior to the inspection, a concern was identified with the emission source labeled "die washer controlled by fume scrubber", listed as exempt per Rule 281(e). Also, there is no documentation of emissions. This exemption does not fit because there is a stack and the cleaning material can become an air contaminant. Light Metals needs to identify if there is an exemption that does fit. The other initial comment I had on the document is that it lists Rule 290 for the individual tanks in the anodize line. It makes it look like there are 14 Rule 290 emission units. This is misleading and if true would give a high potential to emit. It was explained to Mr. Kane that this needs to be reevaluated. Also, it was explained that a toxics review would be conducted to ensure the anodize line qualifies for Rule 290. Additionally, the facility is under the impression that a one-time Rule 290 demonstration is appropriate. This is generally not the standard for Rule 290, and the guidance states on page one that monthly records of emissions must be kept on file. As a result of the initial concerns identified above the AQD has requested, in writing, that the facility conduct and submit a new facility Potential to Emit document identifying the permitting status of each emission unit at the facility. I also suggested that this include a Greenhouse Gas emissions evaluation.

Mr. Kane escorted me to the front of the property where we visually observed the stacks of the anodize line. No visible emissions were noted, just steam. Mr. Kane and I used the 2003 list as a guide to look at equipment at the facility. See notes on attached sheets. The emission source listed as extrusion press #1 and all associated equipment have been removed.

The outdoor cyclone for the chip collector was observed and the area looked clean. The document lists the two cyclone collectors as having a particulate control of 0.01lb/1,000lbs of exhaust gas. Upon further review, this number has been identified as not a typical emission rate for a cyclone collector. Light Metals must utilize a more appropriate emission rate for the facility PTE calculations that have been requested.

Two boilers are physically present, one of which has been decommissioned, and the insides have been removed which is a 1981 Cleaver Brooks model LR715-50. It will eventually be removed. The facility also has a 6.3 mmBtu/hr Burnham commercial natural gas fired boiler that is in operation. It is exempt from permitting, and exempt from NSPS Dc based on size.

The facility operates an anodizing line, with associated tanks and stacks, which has been identified by the facility as Rule 290 exempt. As indicated above, the facility is not keeping monthly records of emissions for this line believing to have utilized a one-time demonstration. Based on discussion with Mr. Kane and my visual observations, many of the tanks and other components have been replaced over the years as the line has operated. A complete review of the Safety Data Sheets was conducted and each CAS # was looked up on the

AQD toxics Screening Level List and it was identified that this line utilizes a coating with a nickel component (CAS # 7440-02-0). Nickel is a Rule 290 excluded compound because the IRSL is $0.0042 \mu/m^3$, and therefore the exemption cannot be used. Light Metals is in violation of Rule 201 for failure to obtain a permit for this operation. One constituent was present in the Tektamer 38 AD product that was not on the AQD Screening Level List. A note has been sent to the AQD Toxics Unit asking for an evaluation. Information obtained will be placed in the file. On a secondary note, the facility should consider updating the Safety Data Sheets as some of them appear outdated.

Mr. Kane and I visually observed the emission unit consisting of the die washer which is controlled by a fume scrubber. As indicated above, the current classification/exemption identified is not acceptable. The unit was in operation at the time of the inspection, with the lid closed. In order to access the area containing the mesh pad fume control area, Mr. Kane and I were required to access an internal second story. This access was obtained by climbing a metal ladder which was enclosed by a metal cage on the upper half. Prior to my ascent, a male employee asked me if I wanted gloves, as to not slip on the ladder. Since I had some in my pocket, I thanked him and put them on. As I ascended the ladder, an employee struck the cage with a metal die that was suspended in the air via a rope and pulley system, causing it to shake. I spoke with Mr. Kane that this is unacceptable. When the second floor was achieved, it became obvious that the floor was wet and there was accumulation of what appeared to be solidified material or emissions on the floor. At the time of the inspection, the wetness appeared to be caused by a leak in the roof near the stack, and we could not tell whether or not that was causing the accumulation of solid matter or not. Mr. Kane stated he would look into it. A data sheet for the solution used in the die washer was requested and Mr. Kane stated it utilizes a caustic soda cleaner.

We observed the stacks on the roof associated with the anodize line. There was no stack emissions other than steam at the time, nor was there obvious visible evidence observed on them or the roof that could be attributed to an emissions episode. Due to the nature of the emissions, and steam plum evident, a close inspection was not conducted of the stacks. Mr. Kane indicated that since he had the date and time of the emissions episode, he will get with production to see what was in operation at that approximate time. His belief is that the cause is the R5 and the company has been working on that aspect of the line.

CONCLUSION

Light Metals was in non-compliance at the time of the inspection. A Violation Notice will be sent.

NAME



DATE

1-6-14

SUPERVISOR

PARB