

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

B626040724

FACILITY: Benteler Aluminium Systems	SRN / ID: B6260
LOCATION: 365 W 24TH ST, HOLLAND	DISTRICT: Grand Rapids
CITY: HOLLAND	COUNTY: OTTAWA
CONTACT: Grace Stone , Safety Specialist	ACTIVITY DATE: 07/17/2017
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance
SUBJECT: The purpose of this inspection was to conduct a complaint investigation and to determine compliance with applicable air quality rules and regulations.	
RESOLVED COMPLAINTS: C-17-01490	

On Monday July 17, 2017 AQD Staff Kaitlyn DeVries (KD) conducted an unscheduled self-initiated inspection in response to an odor complaint that was received by the City of Holland and forwarded to the AQD at Benteler Aluminum Systems located at 365 W. 24th Holland Michigan.

KD arrived on site shortly before 11:00 am and met with Mr. Traver Glassner, Safety Health and Environmental Manager, and Ms. Grace Stone, Safety Specialist. Prior to going on site, KD surveyed the perimeter for excess odors and emissions from the facility. None were noted. KD did, however, note roadwork being done on 24th street which was causing some fugitive dust.

KD discussed the odor complaint with Ms. Stone and Mr. Glassner, and they indicated that Benteler Aluminum Systems (Benteler) had been shut down for much of the week of the fourth of July, when the complaint was received. Mr. Glassner went on to explain that they had some concrete work done around that time, but thought it would be unlikely that an odor would come from the concrete work. Both Mr. Glassner and Ms. Stone stated they often smell solvent odors from some of the local paint shops in the area and wondered if the odor was actually from the paint shops.

Further communication with the complainant revealed that the odors were metallic, dust like, and intermittent. KD relayed this information to Ms. Stone.

Facility Description

Benteler produces aluminum bumpers, seat tracking, and windshield frames for the automotive industry. Primary operations in the facility include extrusion machines, cutting, drilling, welding, casting, cleaning, parts cleaners, and aging ovens.

Regulatory Analysis

Benteler does not currently have any permits with AQD, but rather relies on Rule 201 permitting exemptions. Benteler previously had some permits, but all have subsequently been voided due to changes in the operations.

Compliance Evaluation

There are several small presses, grinding, cutting, CNC, and welding stations are located throughout the facility. The presses are exempt from Rule 201 permitting under Rule 285(2)(l)(i). The cutting, welding, grinding, and CNC machines are exhausted to various baghouses. The small baghouses are exempt from Rule 201 permitting under Rule 285 (2)(l)(vi)(B), while the larger externally vented baghouses are exempt under Rule 285 (2)(l)(vi)(C). The largest baghouse on site is a 15,000 CFM baghouse, that per Mr. Glassner has not been in use since 2015. KD spoke to Mr. Glassner and Ms. Stone about the facility's potential to emit (PTE) for particulate, and they should be mindful of this if they hope to put the baghouse back into production. KD sent Ms. Stone information on how to calculate a PTE and advised her that Benteler should be sure they know with their PTE is for all pollutants.

Benteler has several aging ovens that are associated with Bentelers Billet and Extrusion lines. The ovens are natural gas only, and all are less than 10 mmbtu and are exempt from Rule 201 permitting under Rule 282(2)(a) (l). There are also some water wash lines that are used to clean the finished product. Per Ms. Stone, no solvents or anything aside from water is used on the line. The water wash lines are exempt from Rule 201 permitting under Rule 281(2)(k).

There is one (1) 7.2 MMBtu natural gas solutionizing oven that is used to soften the aluminum prior to forming. This oven process parts that has small amounts of cutting oils, and are not exempt under Rule 282(2)(a)(i). Based on the exemption determination conducted by ERM, supplied to KD at the time of the inspection, this process needs to obtain a permit to install. However, on July 28, 2017 AQD received a letter from Ms. Stone, stating her team is gathering information regarding the Rule 201 exemption, Rule 291, and its applicability. Benteler will be providing information by August 14, 2017. If the determination is that this process is not exempt, a Violation Notice will be issued at that time.

Benteler formerly had forging operations, but that was discontinued in late 2016.

Finally, Benteler does not have any boilers or emergency generators.

Compliance Determination

Based on the observations made during the inspection and a subsequent review of the records, it appears as if Benteler Automotive is in compliance with the applicable air quality rules and regulations, pending notification of the exemption determination. KD also considers this complaint resolved, but will continue to follow up as needed.

NAME Kathryn Durie DATE 8/8/2017 SUPERVISOR [Signature]