

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

B703045925

FACILITY: Reklein Plastics, Inc.		SRN / ID: B7030
LOCATION: 41230 Mound Road, STERLING HTS		DISTRICT: Southeast Michigan
CITY: STERLING HTS		COUNTY: MACOMB
CONTACT: Joe Jankowi, Shop Foreman		ACTIVITY DATE: 08/24/2018
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On August 24, 2018, Michigan Department of Environmental Quality – Air Quality Division (MDEQ-AQD) Staff, I, Adam Bognar conducted an unannounced self-initiated inspection of Reklein Plastics Inc., located at 41230 Mound Road, Sterling Heights, MI, 48314. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules; and Permit to Install No. 268-84.

Permit to install No. 268-84 was issued to Reklein Plastics in 1984 for fiberglass finishing equipment with cyclone control.

I arrived at the facility at around 1 pm. I met with Mr. Joe Jankowy, shop foreman. I identified myself, provided credentials, and stated the purpose of the inspection. Mr. Jankowy gave me a tour of the facility.

Reklein Plastics manufactures structural components by laminating fiberglass panels to an aluminum honeycomb panel using an epoxy resin. After the epoxy resin is applied, the material is allowed to cure at room temperature. After the initial curing, the panels are post cured in a 1.5 MMBtu/hr oven. This process results in a durable, light weight sheet that is approximately 2-3 inches thick. The finished product is trimmed and cut to size at this facility. The fiberglass panels and honeycomb material are not produced at this facility. There are five total employees.

#### **PTI No. 268-84**

Although the special conditions of this permit all apply to the fiberglass cutting/grinding process, this permit also includes the epoxy application/curing process. At the time of permit issuance, emissions from the epoxy were evaluated to be "negligible". The epoxy is a two-part product that is stored in two separate tanks and mixed shortly before being applied to the fiberglass panels. The epoxy is applied by dumping it onto the panels and spreading it out evenly using a paint scraper. Mr. Jankowy stated that combined usage of epoxy products varies but estimated that it is somewhere between 700 and 2000 pounds per month. All process equipment appears to be original.

The epoxies are manufactured by "Resin Services", which is directly adjacent to Reklein Plastics. The Safety Data Sheets for the epoxies used are attached to this report. These sheets indicate that there is 0% volatile in these epoxies. The density is listed as 12.5 lbs/gallon indicating a volumetric use rate of approximately 56 to 160 gallons of epoxy per month.

I compared the new Safety Data Sheets to the old Material Safety Data Sheets from 1983. It appears that the composition of the old product and the new product are essentially the same. Mr. Jankowi stated that very little about the process has changed since he began working at Reklein Plastics in

1987.

Special Condition 10: States that visible emissions from the saws and grinders shall not exceed 20% opacity. I did not observe any opacity. These saws/grinders were not in use during my inspection. I observed that vacuum hoses are located near the sawing/grinding operations and are vented to the cyclone dust collector.

Special Condition 11: limits the particulate emissions from the saws and grinders to 0.10 lbs per 1,000 lbs of exhaust gases. MDEQ-AQD is not requesting a performance test at this time.

Special Condition 12: States that the applicant shall not operate the saws/grinders unless the cyclone is installed and operating properly. I observed that sawing/grinding operations were exhausted to the cyclone dust collector. The cyclone is aged but appeared to be in working order. I did not notice any holes or gaps in the cyclone. The blower to the cyclone unit is only turned on when the saws and/or grinders are being used.

Special Condition 13: States that the disposal of collected air contaminants shall be performed in a manner that minimizes the introduction of air contaminants to the outside air. Mr. Jankowy stated that they try to minimize any losses when disposing of the collected contaminants. Collected air contaminants are disposed of approximately twice per year.

Special Condition 14: Specifies stack requirements for the cutting/grinding operations. I did not verify stack parameters during this inspection. Exhaust from the cyclone appeared to be discharged unobstructed vertically upwards.

**Compliance Determination**

This facility appears to be in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules; and PTI No. 268-84.

NAME

Adam Rogers

DATE

9/6/2018

SUPERVISOR

SK