M3716
MANILA

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

M371645935

FACILITY: C L RIECKHOFF CO		**SRN / ID:** M3716
LOCATION: 26265 NORTHLINE, TAYLOR		**DISTRICT:** Detroit
CITY: TAYLOR		**COUNTY:** WAYNE
CONTACT: Timothy Smith , Treasurer		**ACTIVITY DATE:** 06/29/2018
STAFF: Jill Zimmerman	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION	June 29, 2018
TIME OF INSPECTION	10:15 am
NAICS CODE	332999
EPA POLLUTANT CLASS	VOC, HAP
INSPECTED BY	Jill Zimmerman
PERSONNEL PRESENT	Timothy Smith, Controller
FACILITY PHONE NUMBER	734-946-8220
EMAIL ADDRESS	t.smith@rieckhoff.com

FACILITY BACKGROUND

C.L. Rieckhoff Company, Inc. fabricates sheet metal into conveyor systems typically used for package sorting operations. Operations at this facility began in 1977. The facility is located in a light industrial area. Originally, the facility consisted of two buildings. However, when the facility expanded the main building, the second building was torn down. The facility operates one shift per day, five days per week and employs about 60 people.

REQUIRED PPE

I wore steel-toed protective shoes and safety glasses during the onsite inspection.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received since the facility was last inspected on June 19, 2014. No violation notices (VNs) have been issued. The facility was found to be in compliance during the last onsite inspection.

PROCESS EQUIPMENT AND CONTROLS

Flat sheet metal and angles are formed through cutting, bending and welding into the components which make up the conveyor system. Cutting of the metal is done using plasma cutters. Particulate emissions from the two plasma cutters are controlled by a fabric filter with a pre-cleaner and exhausted through two stacks on the roof. The parts are then coated using hand sprayers in an open paint booth. The paint booth was lined with dry filters and exhausted through three stacks along the east side of the building. Coated parts are then allowed to dry in the open area before being shipped to the customer. All the coatings are solvent based. Xylol is a solvent used for clean-up.

INSPECTION NARRATIVE

I arrived at the facility for an unscheduled inspection. Initially, Mr. Smith and I sat in the conference room to discuss the process at the facility and explain my purpose and expectations for the visit.

Next, we walked through the facility to see the production firsthand. During the walkthrough, a part was being painted in the paint booth. Filters were present. I observed welding operations

in the welding area, and the plasma cutter was being used.

APPLICABLE RULES/PERMIT CONDITIONS

The paint lines are operating under permit 381-97. The special conditions are evaluated below:

13. Compliance – This facility communicates with DEQ in an appropriate manner.
14. Compliance – Collected records show that 4.4 tons of VOCs were emitted between July 2017 and June 2018, which is less than the permitted limit of 9 tons per year. Based on the data submitted, I was able to determine the average pound of VOC emitted per hour. For the past twelve months, the PPH VOCs emitted were in a range between 4.31 PPH and 5.90 PPH, which is less than the 14.0 PPH limit.
15. Compliance – Line 2 no longer operates.
16. Compliance – The facility typically emits less than 300 pounds of Xylol, the clean-up solvent, per month, based on a review of the records collected. Between July 2017 and June 2018, the facility reported emitting less than 1.8 tons of VOC from Xylol, which is less than the permit limit of 2.65 tons per year.
17. Compliance – Based on a review of the collected records, Xylene is the most prevalent HAP used at the facility. Between July 2017 and June 2018, the facility reportedly emitted less than 6.2 tons of aggregate HAPs, and less than 3.8 tons of HAPs associated with Xylol. This is less than the permitted limit of 9.0 tons per year for any individual HAP or 22.5 tons per year of aggregate HAPs.
18. Compliance – The facility uses two coatings at this facility, F77VXL and B50WZ1. The VOC content for F77VXL is 3.32 pounds per gallon and for B50WZ1 is 3.29 pounds per gallon. This is less than the permitted limit of 3.5 pounds per gallon of coating.
19. Compliance – No VE's were observed during the onsite inspection.
20. NA – Stack testing is not required at this time.
21. Compliance – All required filters are installed and properly maintained.
22 and 23. Compliance – The facility maintains the required records. A sample of these records are attached to this report.
24. Compliance – All spent filters and waste coatings are disposed of properly.
25. Compliance – All stacks were installed according to permit requirements and have not been modified since the last inspection.
26. NA – Line 2 is no longer operational.
27. Compliance – SDS sheets are available onsite to be reviewed.
28. Compliance – HPLV spray nozzles are used when applying the coatings.

The two plasma cutters are exempt from permitting by Rule 285 (l)(vi)(C). The welding operations are exempt from permitting by Rule 285(i).

MAERS REPORT REVIEW

The report was received on time and was reviewed on May 18, 2018. It appears that all emissions were reported accurately. The information supplied with this report supports the reported emissions.

FINAL COMPLIANCE DETERMINATION

C.L. Rieckhoff Company appears to be operating in compliance with all state and federal regulations as well as all permit conditions.

NAME _____ DATE 11/15/18 SUPERVISOR JK