

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

N124341181

FACILITY: Big Rapids Products Inc.		SRN / ID: N1243
LOCATION: 525 DEKRAFFT, BIG RAPIDS		DISTRICT: Grand Rapids
CITY: BIG RAPIDS		COUNTY: MECOSTA
CONTACT: Shana Larsen , Safety and Training Manager		ACTIVITY DATE: 08/11/2017
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Minor source inspection FY 2017		
RESOLVED COMPLAINTS:		

Background

Big Rapids Products (BRP) SRN: N1243 is a packaging and value added facility that assists BRP's 1313 Maple Street facility. The production facility is located at 525 Dekraft Road, Big Rapids, Michigan 49307. BRP's facility is located in a mixed residential and industrial area with the nearest residential structure approximately 250 feet west of the facility. The facility was inspected on 8/11/2017 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended and Michigan's Air Pollution Control Rules. Big Rapids Products does not have any permits with the MDEQ Air Quality Division. Big Rapids Products is a minor source for all criteria pollutants.

Inspection

Site arrival was at 10:20 am on 8/11/17. Upon meeting, I presented my State of Michigan identification card, informed the facility representative of the intent of my inspection and was permitted onto the site. Safety and Training Manager, Shana Larsen and Exterior Trim Quality Manager, Becki Garchow showed me the facility. Big Rapids Products is a packaging and value added facility that employs approximately 35 people at this facility. The plant runs one shifts Monday through Friday from 7:00 am to 3:30 pm. This facility primarily handles exterior automotive trim and automotive exhaust components made at its 1313 Maple Street plant.

The value added portion of the process includes the addition of a combination 3M adhesive tape, foam, clips, autowrap protective cover or seals. The parts are hand assembled at individual stations. Depending on the component being added, workers may clean the surface of the part with a wipe. The facility uses isopropyl alcohol (IPA) as a clean material solvent. Becki Garchow indicated that the facility uses approximately 55 gallons of IPA per year. This is an insignificant quantity and the process appears to also be exempt from permitting pursuant to R 336.1285(2)(r)(iv) which in part states...

...The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following... (r) Equipment used for any of the following metal treatment processes if the process emissions are only released into the general in-plant environment... (iv) Cleaning....

For additional clarification, a previous AQD determination states "Cleaning processes can be divided into these general groups: mechanical cleaning (wire brushing, sanding, sand/shot/grit blasting), solvent cleaning (soak, hand or spray operations) or vapor degreasing processes may be exempt per this rule, but still subject to Part 7 rules for cold cleaners and/or vapor degreasers...

The estimated volatile organic (VOC) emissions from this process are approximately 360 lbs

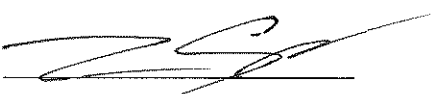
per year. This is well below the significance level of 40 tons (80,000 lbs) per year that would exclude BRP from meeting the exemption.

In addition to the value added process, BRP also has two medium sized (150 ton) presses. The presses were not being used during my inspection. Becki informed me that the presses are not used often, and BRP is in the process of piloting some parts. The presses appear to meet the permit to install exemption requirements pursuant to R 336.1285(2)(l)(i) which in part states...

(l) The following equipment and any exhaust system or collector exclusively serving the equipment: (i) Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals.

Conclusion

It appears that Big Rapids Products is in compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

NAME 

DATE 8/22/17

SUPERVISOR 