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

N195239737

FACILITY: Webb Chemical Service Corp		**SRN / ID:** N1952
LOCATION: 2708 JARMAN ST, MUSKEGON HTS		**DISTRICT:** Grand Rapids
CITY: MUSKEGON HTS		**COUNTY:** MUSKEGON
CONTACT: Tom Finkler , EH & S Coordinator		**ACTIVITY DATE:** 05/10/2017
STAFF: Chris Robinson	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: FY 2017 inspection to determine compliance status with PTI No. 568-95, PTI No. 543-88B and any other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD staff Chris Robinson (CR) was on-site on Wednesday May 10, 2017 to conduct a scheduled unannounced inspection of Webb Chemical Service Corporation (Webb) located at 2708 Jarman Street in Muskegon Heights, MI. CR arrived at approximately 10:15 am and met with Mr. Tom Finkler, Compliance and Safety Supervisor.

No odors or visible emissions were detected at any time during the inspection. CR presented Mr. Finkler with AQD Identification including a business card and informed him of AQD's intent to conduct an inspection of the facility to determine compliance status with respect to their permits (No. 586-95 & 543-88B) and any other applicable air rules and regulations.

Facility Description

Webb Chemical is a chemical distribution facility. Raw chemicals are received via truck or rail car, transferred to large bulk storage tanks and then mixed and/or repackaged per customer specification. Repackaged materials are typically sent out in 15 gallon drums (Deldrums), 55 gallon drums, 200-400 gallon totes, and/or 2,000 - 7,000 gallon tanker truck loads. Webb operates three (3) shifts, seven (7) days per week with approximately 90 employees total.

Compliance Evaluation

PTI No. 568-95

This permit is for operations and equipment contained in building 4. Building 4 is for storage vessels and load out operations associated with inorganic chemicals, HCL and bleach. The facility utilizes a manually operated wet scrubber. Per discussions with MR. Finkler, the facility does not operate the HCL and Bleach processes in this building unless the scrubber is operating. Regular maintenance is conducted and as observed during this inspection, the scrubber is equipped with a liquid flow indicator. Although CR did not measure the stack, it appeared to meet dimensional requirements specified in the permit. Monthly records of process material throughput are included in **Attachment A.** This building also houses a barrel wash area that is no longer being used. There were no operations being conducted in this building at the time of this inspection.

Special Condition 13 of this permit states that the emissions rate from the HCL, HNO3 and NaHSO3 storage tanks, drum washing operation and drum filling operations cannot exceed the following:

Hydrogen Chloride (HCL) – 0.2 lb/hr
Sodium Hypochlorite (NaOCl) – 0.3lb/hr
Sodium Bisulfite (NaHSO3) – 0.63lb/hr

Verification of these limits on a pounds/hour basis, as noted, would require testing. No testing has been requested nor conducted to date. Since there is no record keeping or calculation requirement for this condition, there is no indication that these limits have been exceeded on an instantaneous pounds/hour limit. However, the facility determines compliance with this condition by monitoring monthly throughput (**Attachment A**) and comparing it to a 1995 calculation developed to determine pound/hour emissions based on maximum annual throughput (**Attachment B**). Based on discussions with Mr. Finkler and a review of these records, the facility cannot exceed an annual HCL throughput of 3,076,416 pounds. The facility's 2016 throughput was 1,861,160 pounds, which is well below their calculated limit. The facility did not use any Sodium Bisulfite or Sodium Hypochlorite in 2016 or in January - April 2017.

PTI No. 543-88B

Building 5 consists of the tanker and rail car unloading/transfer area as well as the outdoor and adjacent tank farm which consists of seven (7) 4,000 gallon tanks and six (6) 10,000 gallon tanks used for organic liquid storage. The facility utilizes one (1) pump to move product from the trucks or rail car to the storage tanks and a second pump to move product from the storage tanks to the drum/container filling station (EU-DRUMOUT1). A second filling station (EU-DRUMOUT2) has been included in the permit but not yet installed. CR informed Mr. Finkler that the 18 month construction period, specified in PTI No. 543-88B General Condition No. 2, ended October 2015 and that EU-DRUMOUT2 will need to be re-permitted prior to installation.

The tank farm is subject to the emission and material limits specified in the tables below. There is no record keeping or calculation required for the emission limits (conditions I.1-5). However, the emission limits are based on material limits,

therefore, the facility demonstrates compliance by tracking monthly and annual throughputs. Provided in the "Material Limits" table below are the 2016 throughputs provided by Mr. Finkler (**Attachment C**). Based on this data the facility appears to be operating well below the specified material and emission limits.

Emission Limits:

Pollutant	Limit	Time Period/Operating Scenario
VOC	4.41 tpy	12-month rolling
Acetone	10.31 lb/hr	8-hour average
Isopropyl Alcohol	0.76 lb/hr	Calendar day average
Methyl Acetate	10.66 lb/hr	8-hour average
Xylene	0.35 lb/hr	Calendar day average

Material Limits:

Solvent	Throughput Limit	2016 Throughput
Toluene	1,000,000 gallons per 12-month rolling time period / solvent	232,211
Acetone		239,245
Isopropyl Alcohol		127,623
Glycol Ether EB		81,939
Methanol		232,882
MEK		146,497
Methanol Flush	500,000 gallons per 12-month rolling time period / solvent	12,074
MAK		24,107
Solvent 142		26,160
Methyl Acetate		34,240
Xylene		62,326
WCS 100		88,703
VMP Naphtha		45,224

In addition, conditions II.2-3 limit how much Acetone, Isopropyl Alcohol, Methyl Acetate and Xylene, can be received if using one or two storage tanks. Per discussions with Mr. Finkler, a review of the facility's Organic Tank Farm Records (**Attachment C**) and purchase order summary (**Attachment D**) for December 2016 the facility only receives one tank for each of these solvents. The maximum tank capacity is 10,000 gallons, which is well below the limits specified in their permit for a single tank. Therefore, the facility can never exceed these limits.

The following records have been provided as required and are attached:

- Monthly records of FG-TANKFARM throughput on a 12-month rolling time period (**Attachment C**)
- Tank records for Acetone, Isopropyl Alcohol, Methyl Acetate and Xylene (**Attachments C & D**)

Other applicable air rules and regulations

Building 1 is considered the tanker truck wash and maintenance area. The facility's only parts washer, which contains mineral spirits, is in this building. Instructions were posted and the lid was closed. The parts washer had an air/surface area of less than 10 square feet, therefore it appears to be exempt under Rule 281(2)(h).

Building 2 is a warehouse for combustible and flammable compounds stored in 55 gallon drums and totes. Unit 2 is a manually operated standalone packaging station, containing a scale for weighing the product. Unit 2 appears to be exempt under Rule 290. Mr. Finkler provided records demonstrating compliance with Rule 290 (**Attachment E**).

Building 3 is empty container storage and temporary storage of repackaged or finished goods for buildings 7, 8 and 9. Drums and totes stored in this building are transferred to the filling station located in building 6 for product repackaging.

Once the product is repackaged it is temporarily transferred back to building 3 until the entire repackaging activity is completed. Once completed, the now finished goods (drums or totes) are relocated to buildings 7, 8 or 9 for storage.

Building 3 also houses a small 1.6 mmbtu/hr natural gas Hurst boiler installed in 2011 and an indoor tank farm consisting of eighteen (18) 8,700 gallon tanks. The boiler appears to be exempt per Rule 282(2)(b)(i) – less than 50,000,000 btu/hr of natural gas and the indoor tank farm appears to be exempt per Rule 290. For the tank farm, the highest 2017 emission rate was 9.1 lbs. in March, well below the 20 lbs/month limit (**Attachment E**).

Building 5 is the tanker and rail car unloading/transfer area and outdoor tank farm discussed above. The unloading/transfer area appears to be exempt under Rule 290. Based on records included in **Attachment E**, the highest 2017 emission rate was 79 lbs. in April, well below the 1,000 lbs/month limit.

Buildings 7, 8 and 9 are for finished goods and packaging only. No production occurs in these buildings. Building 8 also includes a maintenance garage. There does not appear to be any processes or equipment in these buildings that are subject to any air rules and regulations.

Compliance Determination
Based on the observations made during this inspection and subsequent records review, Webb appears to be in compliance with their permits (No. 586-95 & 543-88B) and any other applicable air rules and regulations.

Attachments
A - 2016 & 2017 Inorganic Tank Farm Summaries
B - Drum Filling Emission Calculations
C - 12 Month Organic Tank Farm Summary
D - Solvent Tank Purchase Order Records
E - Rule 290 Records

NAME _____ DATE 6/7/2017 SUPERVISOR _____