

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N195264876

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: 09/08/2022
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection to determine compliance with permit requirements and all other air quality rules and regulations,		
RESOLVED COMPLAINTS:		

Introduction

On September 8, 2022, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an unannounced, on-site inspection of the Webb Chemical Service Corp. facility located at 2708 Jarman St. in Muskegon Heights, Michigan, to assess compliance with all applicable permit requirements and air quality rules and regulations. This facility currently has two active Permits to Install (PTI): PTI Nos. 543-88C and 568-95.

Webb Chemical is a chemical mixing and distribution facility. It receives bulk chemicals and transfers them to large storage tanks. The chemicals are then repackaged, possibly after mixing, for shipment off to the customer. These chemicals are packaged in various containers ranging in size from 15 gallon drums to 7,000 gallon tanker trucks.

Upon arrival, SE conducted an evaluation of the facility perimeter. No odors or visible emissions (VEs) were observed originating from the facility. SE then entered the facility and was greeted by Compliance & Safety Supervisor Tom Finkler and Plant Manager John Nekic. After a brief discussion of the purpose of the visit, an inspection of the facility was conducted.

PTI No. 543-88C

PTI No. 543-88C is a modified permit. PTI No. 543-88 was first approved in 1988. This modified permit was approved on March 6, 2018. It encompasses 15 emission units (EUs) and one flexible group (FG) as follows:

- EU-TANK1
- EU-TANK2
- EU-TANK3
- EU-TANK4
- EU-TANK5
- EU-TANK6
- EU-TANK7
- EU-TANK8
- EU-TANK9
- EU-TANK10
- EU-TANK11
- EU-TANK12
- EU-TANK13
- EU-DRUMOUT1
- EU-DRUMOUT2

- FG-TANKFARM

FG-TANKFARM

FG-TANKFARM is an FG that includes all of the EUs included in the permit. Each tank emission unit has a pressure set valve and a nitrogen blanket.

The table below summarizes the emission limits applied to this FG as well as compliance determined by records provided by the facility:

Pollutant	Limit	Time Period	Equipment	Recorded Actuals (Max)	Compliant?
1. VOC	4.41 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-TANKFARM	2.02 tpy	Yes
2. Acetone	10.31 lb/hr¹	8-hour average	FG-TANKFARM	1.49 lb/hr	Yes
3. Isopropyl Alcohol	0.76 lb/hr¹	Calendar day average	FG-TANKFARM	0.22 lb/hr	Yes
4. Methyl Acetate	10.66 lb/hr¹	8-hour average	FG-TANKFARM	0.81 lb/hr	Yes
5. Xylene	0.35 lb/hr¹	Calendar day average	FG-TANKFARM	0.03 lb/hr	Yes

The records provided by the facility to make the above compliance determinations is discussed further below.

The table below summarizes the material limits applied to this FG as well as compliance determined by records provided by the facility:

Substance	Throughput limit	Recorded Actuals (Max)	Compliant?
Toluene	1,000,000 gallons per year of each substance, based on a	174,500 gallons	Yes
Acetone		548,489 gallons	Yes
Isopropyl alcohol		190,826 gallons	Yes

Glycol Ether EB	12-month rolling time period as determined at the end of each calendar month	68,196 gallons	Yes
Methanol		174,181 gallons	Yes
Methyl Ethyl Ketone	500,000 gallons per year of each substance, based on a 12-month rolling time period as determined at the end of each calendar month	134,779 gallons	Yes
Methanol - Flush		24,506 gallons	Yes
Methyl Amyl Ketone		28,781 gallons	Yes
Solvent 142		80,038 gallons	Yes
Methyl Acetate		21,222 gallons	Yes
Xylene		35,037 gallons	Yes
WCS 100		37,423 gallons	Yes
VM&P Naphtha		29,120 gallons	Yes

The records provided by the facility to make the above compliance determinations is discussed further below.

This FG also has the following additional material limits associated with it:

- No more than two tanks of Acetone, Isopropyl Alcohol, Methyl Acetate, or Xylene may be kept at any time. Discussion with facility representatives confirmed compliance with this requirement.
- No more than the following amounts of the listed chemical may be received when stored in a single tank:
 - 21,308 gallons per day of Acetone
 - 33,269 gallons per day of Isopropyl Alcohol
 - 18,425 gallons per day of Methyl Acetate
 - 46,391 gallons per day of Xylene
- No more than the following amounts of the listed chemical may be received when stored in a single tank:
 - 21,308 gallons per day of Acetone
 - 33,269 gallons per day of Isopropyl Alcohol
 - 18,425 gallons per day of Methyl Acetate
 - 46,391 gallons per day of Xylene

Records regarding the above receiving limits were provided to the AQD. For brevity, a detailed analysis of these daily records is not included in this report. Detailed review showed that the facility is compliant with the limits and a copy of the records is included with this report.

Record keeping requirements for this FG include keeping records to demonstrate throughput of permitted chemicals, tank contents, chemical receiving records, and emission levels. Records are maintained and were provided to the AQD for the period of September 2021 through August 2022. The provided records were compliant with record keeping requirements and were sufficient to demonstrate compliance with emissions and material limits as discussed above.

The facility was required to report to the AQD within 30 days of the completion of installation of EU -DRUMOUT2. At the time of the inspection there was no record of completion of installation. As the equipment had been installed and was operational, the facility was in violation of this permit

requirement during the inspection. This issue was discussed with the facility, and it was expressed that installation had been completed shortly after the permit was issued in March of 2018. No violation will be issued at this time as the facility is compliant with all other requirements associated with the equipment and correction of the violation would be informing the AQD of operation, which the AQD is now aware of completed installment and operation.

This FG has one associated stack that is required to be no more than 13" in diameter and no less than 22' in height. The stack was not directly measured for safety reason, but observation showed that the stack appeared to be compliant with size requirements.

PTI No. 586-95

PTI No. 586-95 was first approved on June 27, 1996. It was revised to its current draft and approved on January 3, 1997. It encompasses storage and load out equipment within building 4 of the facility. It contains six Special Conditions (SCs).

SC13 sets emission limits for associated process equipment as follows:

- 0.2 lbs/hr of Hydrogen Chloride.
- 0.3 lbs/hr of Sodium hypochlorite.
- 0.63 lbs/hr of Sodium bisulfite.

The facility monitors this through monthly throughput records used to calculate average hourly emission rates. These records are included with this report. Further confirmation of hourly rates would require additional testing. However, at this time it is not felt that additional testing is necessary.

SC14 states that VEs from this equipment cannot exceed 5%. During the inspection there were no visible emissions from this equipment, demonstrating compliance with this condition.

SC15 and SC16 state that the equipment cannot operate unless the associated scrubber is installed and operating properly as demonstrated by and installed and operational liquid flow meter. During the inspection the scrubber was not in use as there was no transfer of HCl being conducted at that time. However, it could be seen that a flow rate monitor was installed and instructions on what a proper flow rate would be according to equipment specifications during operation could be seen next to the meter.

SC17 requires that monthly throughput records be kept for operation of this equipment. This information was included with the records provided for SC13. The provided records were compliant with this condition.

SC18 requires that a stack no larger than 8" in diameter and 25' in height be used to exhaust gasses from this equipment. During the inspection, the stack was observed. It was not measured directly for safety reasons, but observations showed that the stack appeared to be compliant with this condition.

Other Items

The facility maintains a parts washer on site. This parts washer was close lidded during the inspection and is exempt from air permitting requirements by Rule 281(2)(h).

The facility has a building used for storage of large drums of flammable compounds. This building has a standalone packaging station that appears to be exempt from permitting under Rule 290. Records were provided to demonstrate compliance with the exemption and are included with this report.

The facility has a tank farm of eighteen 8,700-gallon tanks. These tanks appear to be exempt from permitting under Rule 290. Records were provided to demonstrate compliance with the exemption and are included with this report.

The facility has a transfer station that appears to be exempt from air permitting requirements under Rule 290. Records were provided that included transfer losses at this station to demonstrate compliance with the exemption and are included with this report.

The facility has one boiler that is natural gas fired and rated at 1.6 mmBtu/hr. This boiler is exempt from air permitting requirements under Rule 282(2)(b)(i). This boiler is exempt from New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Dc as it is less than 10 mmBtu/hr output. It is also exempt from NESHAP 40 CFR Part 63 Subpart JJJJJ as it is a gas-fired boiler.

Conclusion

At the conclusion of this inspection the facility appeared to be in violation of one permitted requirement as discussed above. No violation notice will be issued at this time as correction of the violation only requires sending a written document to the AQD which was not sent prior. The facility appears to be compliant with all other applicable air quality rules and regulations.

NAME Scott Evans

DATE 9/29/2022

SUPERVISOR HH