

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

N217059846

FACILITY: WKW Extrusion, Erbsloeh Aluminum Solutions, Inc.		SRN / ID: N2170
LOCATION: 6565 SPRINKLE RD, PORTAGE		DISTRICT: Kalamazoo
CITY: PORTAGE		COUNTY: KALAMAZOO
CONTACT: Luke Ryskamp , EHS Manager		ACTIVITY DATE: 08/19/2021
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection		
RESOLVED COMPLAINTS:		

Staff, Monica Brothers, arrived on-site at about 11:15 am and met with Luke Ryskamp, EHS Manager. We first sat down in a conference room to discuss the inspection process and go over what records I wanted to see. WKW Extrusion creates various metal products by the aluminum extrusion process. Some finished products include refrigerator, office furniture, and automotive parts. They commenced operations at this location sometime in the 1980s. The facility has about 320 employees, who work three shifts per day, Monday through Friday. They are currently operating under PTI #458-89C and PTI #11-20. Luke said that the facility has one parts washer, one boiler, and one emergency generator.

I asked Luke for the records associated with their two permits, but he said that he did not know that they needed to keep records. The facility does not currently have any records. This is a violation of both PTIs, and a Violation Notice will be sent.

We then took a walk-through of the facility to observe the processes and equipment.

Exempt Equipment:

There are about ten to twelve CNC machines, which are exempt under Rule 285(2)(l)(vi), and three metal extrusion presses, which are exempt under Rule 285(2)(k). There are also three cure ovens that operate at about 325°F. Oven 1 is 5 MMBTU/hr, Oven 2 is 1 MMBTU/hr, and Oven 3 is 5 MMBTU/hr. These are considered exempt under Rule 282(2)(a)(i). There is one gas-fired Seminole boiler, model 6-5-750-G, built in 1988. It can produce 5,175 lbs steam/hr and burns 6,300 cubic feet of gas per hour. This boiler is considered exempt under Rule 282(2)(b)(i). There is one natural gas-fired Generac emergency generator that was installed around 2019. It runs for thirty minutes each week for readiness testing. During the tour, the non-resettable hour meter read 103.2 hours. The generator is considered exempt under Rule 282(2)(b)(i). There is one Crystal Clean parts washer that uses Crystal Clean 106 Mineral Spirits and is maintained by Crystal Clean. The lid was closed at the time of inspection.

PTI #458-89C:

This PTI is for a bright dip tank, a caustic etch tank, two stripping tanks, two die cleaning tanks, and three associated water scrubbers. The bright dip tank has emission limits for nitric acid (5.24 lbs/hr and 10.48 tons per year) and phosphoric acid (1.05 lbs/hr and 2.1 tons per year). The caustic etch tank, two stripping tanks, and two die cleaning tanks have a sodium hydroxide emission limit of 0.34 lbs/hour and 0.68 tons per year. The facility is not keeping these records. A Violation Notice will be sent for lack of recordkeeping. This equipment is enclosed in a fiberglass enclosure during operation. Each of the scrubbers has a liquid flow indicator and a pH measuring

device. I asked Luke how they know when there is something wrong with the scrubbers or when they need maintenance. He said that they monitor the flow and pH levels, but that they do not currently keep records of when that occurs. I recommended to him that he should put together a maintenance, monitoring and recordkeeping plan for the scrubbers, so that they know when there is an issue and when they likely need maintenance.

PTI #11-20:

This PTI is for a 2.5 MMBTU/hr natural gas-fired heat treatment furnace used to treat aluminum parts. The furnace is exhausted through an oil mist collection system. This furnace is capable of treating 3,500 pounds of aluminum per batch. This permit required that they submit a Malfunction Abatement Plan (MAP) within 45 days of permit issuance. The facility did not submit a MAP. This will be included in the Violation Notice. This permit also requires that they measure and record the pressure drop across the filter of the oil mist collection system on a daily basis. The facility is not keeping these records, and this will also be included in the Violation Notice.

The facility was not in compliance at the time of inspection. A Violation Notice will be sent.

NAME Menica Bastona

DATE 9-15-2021

SUPERVISOR Menica Bastona

Acting District Supervisor for Rex Lane