

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

N234752554

FACILITY: L3Harris		SRN / ID: N2347
LOCATION: 5353 52nd Street, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Kurt Rowell , Health & Safety		ACTIVITY DATE: 02/26/2020
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:00 P.M. on February 26, 2020, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of L3Harris (formerly L3 Communications) located at 5353 52nd Street in Grand Rapids. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. Kurt Rowell, Environmental Health and Safety Lead accompanied AQD staff on the inspection.

FACILITY DESCRIPTION

L3Harris manufactures aerospace equipment, such as, the "black box", gyroscopes, and circuit boards for commercial and military aircraft. The facility consists of painting, solvent cleaning and various small electronics manufacturing processes. All equipment is exempt from New Source Review permitting and the facility is considered a true minor source of VOC emissions based on a potential to emit (PTE) demonstration made in 2006. There have been no significant changes made at the facility since the last AQD inspection in 2012 that would have increased the PTE.

COMPLIANCE EVALUATION

The company has the following equipment:

Paint Room:

The Paint Room contains three small paint spray booths that are exempt under Rule 287(2)(c). Each booth has an open face of approximately 4 feet by 4 feet. High volume low pressure (HVLP) guns are used in each booth. From February 2019 through January 2020, company records show that less than 2 gallons of paint were used per month in all booths which is well below the 200 gallon per month limit in the rule. Records are attached.

There is one Uni-Ram paint gun cleaner next to the spray booths that is exempt under Rule 290. The unit is an enclosed cabinet with a 3" diameter exhaust vent. From February 2019 through January 2020, company records show no more than 73 pounds of VOC were emitted in a month which is well below the 1,000 pound per month limit in Rule 290. Records are attached.

Also there are four circuit board wash tanks (cold cleaners) exempt from permitting under Rule 281(h). Essentially the four tanks (or approximately 10 gallon containers) have varying concentrations of isopropyl alcohol. These units are subject to Rule 707; operating procedures were posted, lids closed and appropriate freeboard ratio was marked on the containers. None of these wash tanks are vented out of the building.

Varnish Room:

There are two varnish dip tanks exempt from permitting under Rule 287(2)(c) where parts are submerged into varnish and a vacuum is used to impregnate the varnish into the small crevices of the part. This is a closed loop process and any varnish not applied to the part is reused. Records were reviewed on site which showed approximately 10 - 15 gallons of varnish are added each year. This is well below the Rule 287(2)(c) usage limits. This unit was recently moved from another part of the plant and was in the process of being reinstalled at the time of the inspection.

In addition, this area consists of two varnish bench grinders which are exempt under Rule 285(2)(l)(vi).

Media Blast:

There are two media blasters which are exempt under Rule 285(2)(l)(vi) which are used to clean parts. These have not changed since the last AQD inspection.

Wave Solder Room:

There is one wave solder machine exempt from permitting under Rule 285(2)(i). The equipment was not operating at the time of the inspection.

A citrus based circuit board wash machine (cold cleaner) was removed from this area.

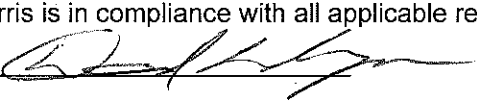
Boilers:

The facility has three identical natural gas-fired boilers each with a heat input capacity of 1.5 MMBtu/hr which are exempt from permitting under Rule 282(2)(b)(i).

SUMMARY

L3Harris is in compliance with all applicable requirements.

NAME



DATE

3/6/20

SUPERVISOR

