

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

N328352638

FACILITY: JOST INTERNATIONAL, CORP.		SRN / ID: N3283
LOCATION: 1770 HAYES RD, GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Dan Athey, Plant Manager		ACTIVITY DATE: 03/02/2020
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY '20 on-site inspection to determine the facility's compliance status with respect to PTI No. 335-05 and any other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD Staff Chris Robinson (CR) conducted a scheduled unannounced inspection of Jost International, Corporation (Jost, SRN N3283) located at 1770 Hayes Street in Ottawa County, Grand Haven, Michigan. CR met with both Dan Athey, Plant Manager, and Randy Smith, Director of Quality Control and Technical Support. The intent of the visit was relayed along with identification. Prior to entering the facility, the perimeter of the building was surveyed for odors and visible emissions. None were observed. Per discussions with Mr. Athey and Mr. Smith, there have been no changes since the last inspection, which was conducted on February 4, 2009.

Jost's Grand Haven facility manufactures trailer landing gear. The facility receives raw steel then cuts, machines, and welds it to the proper size and shape. This includes both the outer shell of the landing gear as well as the internal workings that allow the landing gear to extend and retract.

Welding emissions were historically controlled by use of a baghouse. This baghouse is still located onsite but is not functional. The facility curtained off the welding area and is now venting this area through large roof vents that exhaust directly to ambient air. No filters are used anywhere in the system. Although welding is exempt from Rule 201 permitting requirements per Rule 285(2)(i), CR discussed that opacity is still limited to 20% per Rule 301 and nuisance odors are not allowed per Rule 901. Welding was taking place and no odors or visible emissions were observed outside of the building.

Machining operations are vented to the in-plant environment which appears to be exempt from Rule 201 permitting requirements per Rule 285(2)(i)(vi)(B). The facility also has two (2) cold cleaners. Neither were being used, one was open and the other one was closed. Instructions were provided and CR informed staff that the units need to remain closed when not in use. Mr. Athey closed the lid on the unit that was left open. Safety Kleen maintains these units. Cold cleaners with an air/vapor interface of no more than 10 square feet, which these were, are exempt from Rule 201 permitting requirements per Rule 281(2)(h).

The facility operates a metal parts coating line under Permit to Install (PTI) No. 335-05. This line consists of a three-stage parts washer with a natural gas fired heater, a primer (paint) dip tank, and a natural gas fired curing oven. This emission unit (EU-EMU#1) is subject to a VOC emission limit of 30 tons per year (PTI Special condition (SC) I.1), based on a 12-month rolling time period and a VOC material limit of 3 pounds per gallon minus water and as applied (PTI SC I.2). Records were provided as required in SC I.7 and per Mr. Smith the facility is calculating VOC emissions based on manufacturer specified data not a safety data sheet (SDS) but he was unsure of where the VOC content came from. The facility was given approval to use manufacturer's formulation data on May 17, 2006 but the VOC content in the facility's records of 1.13 lbs/gal appears to have come from a method 24 test, per email

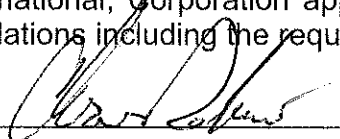
correspondence provided by a Mr. Roger Bour on 10/30/2008. At AQD's request Mr. Smith provided updated Manufacturers data by email on March 12, 2020, which is attached. This data includes a Method 24 VOC content and an emissions factor for the paint. The VOC content is 2.88 lb/gal while the emissions factor or "Actual VOC Emitted per gallon" is 1.49 pounds. The 2.88 lb/gal VOC content is still within the 3 lb/gal material limit specified in SC I.2 of the PTI. However, the facility will need to pay close attention to this content limit as it is 96% of the limit. The facility should begin requesting this data from the manufacturer more frequently to ensure that they stay under the limit. The facility will also need to update their emissions factor from 1.13 lbs/gal to 1.40 lbs/gallon. This change is not expected to increase annual (12-month rolling) emissions to a level that will exceed the 30 tpy emission limit specified in SC I.1. However, the facility will be providing updated records to the AQD in the near future.

Special Condition I.6 requires the facility to maintain a listing from the manufacturer of the chemical composition of each material used. The facility only uses one (1) primer and one (1) wash solution consisting of Iron Phosphate. An SDS for the paint, as allowed by SC I.6, demonstrates compliance with this requirement. All of the records required by SC I.7 have been provided and are attached. The stack height and diameter requirements in SC 1.8a-d were not explicitly verified but the stacks were observed and appeared to visually meet these requirements. In addition, Mr. Athey and Mr. Smith indicated that there have been no changes to the stacks since the last inspection. Lastly, SC I.3 requires proper disposal of all waste. The facility generates very little waste coating and washer solvent but what waste they do generate is disposed of in a metal container with a lid kept closed.

The facility reports annual emissions to MAERS. The 2019 MAERS report is attached and it is consistent with the records provided during the recent inspection. Jost is considered to be a Minor source of emissions that does not appear to be subject to any Federal Standards. Therefore, annual submissions are not required.

Based on the observations and record review made at the time of this inspection Jost International, Corporation appears to be in compliance with applicable air quality rules and regulations including the requirements specified in PTI No 335-05.

NAME



DATE

4/7/2020

SUPERVISOR

