

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

N335459674

FACILITY: SUSPA, INC		SRN / ID: N3354
LOCATION: 3970 ROGER B. CHAFFEE BLVD., GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Tammi Ball , Quality Manager		ACTIVITY DATE: 08/24/2021
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection. There were no odors or visible emissions noted. My arrival was shortly before 1:00 PM, and I introduced myself to the receptionist and presented my government issued identification. I was informed that the responsible employee was at lunch, so I waited outside. I re-entered the facility shortly after 1:00 PM. The receptionist was speaking to an employee over the phone who initially declined to allow an inspection. I discussed my government authority and rights to enter a facility for an inspection at a reasonable time. The employee declined to meet with me but indicated that they would send a different employee to meet with me. I was quickly met by Tammi Ball, Quality Manager who apologized for the delay and misunderstanding.

FACILITY DESCRIPTION

Suspa is a producer of gas springs (gas pressure dampers, gas pressure springs), hydraulic dampers, friction dampers (vibration dampers), lifting columns, piston rods, and crash management and safety systems, as well as complex drives and actuators. The activities for the manufacture of these systems take place in two buildings and is comprised of painting and product assembly. Suspa has around 150 employees. Building 1 operates 2 shifts, 22 hours per day and Building 2 operates 3 shifts.

Building 1:

Building 1 contains a coating line and associated pre-treatment phosphate wash system and curing oven. Only one coating is used on this line, which is comprised of a water based two-part epoxy. The wash system is exempt from permitting pursuant to Rule 281. Suspa has identified that the Rule 290 exemption applies to the paint line. I requested recordkeeping for 2021 to review the emissions data. Safety Data Sheets (SDS's) were provided for the two-part epoxy as well as the two thinning/cleaning solvents that are used. A review of the records indicated that Suspa was maintaining sufficient records for the two-part epoxy but was not including emissions from the two thinning/cleaning solvents. A review of the SDS's for the thinning/cleaning solvents found that they are both 100% volatile organic compound (VOC) products and that there are three ingredients that have carcinogenic VOC's with Initial Risk Screening Levels (IRSL's) less than 2.0 µg/m³ which are limited by Rule 290 to a combined 20 pounds of emissions per month. I requested usage data from Ms. Ball and explained the requirements of the rule via email. A copy of the Rule 290 guidance was also provided. A review of the 2013 inspection report indicated that the company had been advised that Rule 290

recordkeeping was required for the paint line solvent, and recordkeeping should be implemented.

During discussions with Ms. Ball I learned that Suspa is not maintaining records of the usage of either paint line solvent. Emissions generated from the solvent used exclusively on the paint line are considered part of that emission unit and should be tracked along with emissions from paint usage. Since emissions from the solvent use is unknown, compliance with Rule 290 is not being demonstrated. This is a violation of Rule 201 for failure to have records to demonstrate compliance with an exemption. A Violation Notice will be issued. If compliance with Rule 290 cannot be achieved due to the carcinogenic materials in the solvent, a Permit to Install is required.

The company is in the process of installing a new tube washing line, that is intended to replace the existing tube washing line when it becomes fully operational. This line is externally vented and uses a rust inhibitor product containing stoddard solvent. This line has been identified as exempt from permitting pursuant to Rule 285(2)(l)(iii).

There are two offset transfer pad printers in use and one regular pad printer that is not in use. These printers are exempt from permitting pursuant to Rule 285(2)(l)(ix).

Resistance and TIG (tungsten inert gas) welding occurs, and this is done by hand or using a robot. The welding activities are exempt from permitting pursuant to Rule 285(2)(i).

The instapak system which utilizes a two part component foam is currently not in use at the facility, however it is exempt from permitting pursuant to Rule 286(2)(e).

The finishing department attaches an end fitting to parts using a drop of glue. This glue usage is exempt from permitting pursuant to Rule 287(2)(a).

Building 2:

Building 2 consists of four robot product assembly lines, and manual assembly which are not sources of air pollution.

SUMMARY

Suspa was non-compliance at the time of the inspection.

NAME April Lazzaro

DATE 09/08/2021

SUPERVISOR HH