

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

N538324425

FACILITY: Mersen USA		SRN / ID: N5383
LOCATION: 712 INDUSTRIAL PARK DR, GREENVILLE		DISTRICT: Grand Rapids
CITY: GREENVILLE		COUNTY: MONTCALM
CONTACT: Jason LaFramboise , Quality/Safety Manager		ACTIVITY DATE: 03/04/2014
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Scheduled Inspectoin		
RESOLVED COMPLAINTS:		

FACILITY DESCRIPTION

The facility manufactures various graphite/carbon products via milling, sawing, lathing, grinding, sanding, etc. Emissions from the graphite machining operations are ducted to baghouse control and vented into the in-plant air.

REGULATORY OVERVIEW

The facility holds one air use permit (PTI No. 190-04B) which contains four emission units grouped by the baghouses that control the associated machining processes. The four emission units are flexed together to form FG FACILITY.

COMPLIANCE EVALUATION

Prior to entering the facility a survey of the perimeter was made. No abnormal odors or opacity were noted.

At the facility EG was requested to sign a non-disclosure form which EG declined. EG met with Jason LaFramboise, Quality/Safety Manager.

Mr. LaFramboise stated that their existing permit was exempt. It was later determined that the facility had submitted a permit application in 2011 for the addition of new equipment and was informed that the equipment was exempt from the need to obtain a permit to install under Rule 285(l)(vi)(B). It appears that Rule 285 was modified in 2008 to list graphite.

In addition to the equipment associated with PTI No. 190-04B, the facility has installed two additional CNC mills, each controlled by 9,000 cfm baghouses. These processes are exempt from needing a permit to install, as discussed above, so long as they adhere to the requirements of Rule 285 and only process graphite or other listed material. A permit to install application was submitted for this equipment (PTI No. 190-04C) and subsequently withdrawn based upon the graphite exemption in Rule 285.

Mr. LaFramboise stated that in addition to processing graphite, they also process some carbon. Rule 285 does not list carbon as an exempt material. While graphite is an allotrope of carbon, the rule specifically lists graphite. Therefore any equipment used to process material other than graphite and is not listed in Rule 285, would not be exempt from the need to obtain a permit to install.

Below is an evaluation of the processes limitations and restrictions contained in PTI No.190-04B.

The permit addresses four emission units that are combined into one flexible group, FG FACILITY.


The permit contains one emission limit that limits FG FACILITY to no visible emission. No visible emissions were observed from the facility.

The permit requires that the baghouses are installed, maintained and operated in a satisfactory manner. While onsite staff did not observe anything to the contrary.

The permit requires that exhaust gases from FGFACILITY, not be discharged to the ambient air. While onsite staff did not observe any emissions being ducted to the ambient air.

Conclusion

Based on the information and observations made during this inspection, the facility appears to be in compliance with PTI No. 190-04B.

NAME 

DATE 3/7/2014

SUPERVISOR 