

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

N554134211

FACILITY: TECH LINE PRODUCTS		SRN / ID: N5541
LOCATION: 950 W BROADWAY, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: David Ritchie , Safety Director		ACTIVITY DATE: 04/12/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to determine compliance with PTI No. 253-95A and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Tuesday April 12, 2016 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Tech Line Products, otherwise known as Wilbur Products, located at 950 W. Broadway St, Muskegon, Michigan. The purpose of this inspection was to determine compliance with Permit to Install (PTI) No. 253-95A and all other applicable air quality rules and regulations.

KD arrived at the facility at approximately 10:00 am and surveyed the area for odors and opacity prior to entry. None were observed. KD met with Mr. David Ritchie, Safety Director, to explain the purpose of the visit. KD supplied Mr. Ritchie with the Environmental Rights and Responsibilities Pamphlet, which was briefly discussed. Records were also requested at that time, and supplied to KD on a later date. After the discussion, Mr. Ritchie gave KD a tour of the facility. KD left the facility at approximately 11:00 am.

Facility Description

Tech Line Products (Tech Line) manufactures bowling ball cores. The facility uses polyester resins and various dyes to mold and create the cores. Once the cores are made, the balls proceed on to the finishing and polishing areas for completion. The facility has approximately 20 employees, and operates one (1) shift, five (5) days per week.

Regulatory Analysis

Tech Line is a minor source that has one (1) permit, PTI No. 253-95A. Tech Line is not subject to any federal regulations at this time. The permit covers the polyester resin slurry mixing and molding processes, and the associated equipment. Tech Line also utilizes some Rule 201 permitting exemptions. Further detail in regards to the permitted and exempt equipment can be found in the compliance evaluation section of this report.

Compliance Evaluation

The resins are mixed in the mixing room in preparation for the molding processes. Tech Line has four (4) mixing stations that are exhausted to a common stack. The mixing room is also where any dyes or colorants are mixed for the finishing process. The two (2) mold production areas are exhausted to a common baghouse. Once the cores are molded, the cores go through a drying oven; the oven has a heated, portion (150°F) and a non-heated portion. This oven is exempt from Rule 201 permitting under Rule 282 (b).

The finishing processes are housed in a separate building located directly behind the main building where the molding occurs. The finishing area is composed of three (3) sandblasting stations and two (2) lathes for grinding. All of these processes are vented to a common baghouse. These processes are exempt from Rule 201 permitting under Rule 285 (l)(vi). The polishing area, where the dyed resin is applied, also goes through a curing oven when it is finished. The product is heated at 120°F for 10 minutes. This oven is exempt from Rule 201 permitting under Rule 282 (b).

Additionally, Tech Line has one (1) 400 MBTU Natural Gas only boiler. This unit is exempt from Rule 201 permitting under Rule 282 (b)(i).

Total combined Styrene emissions from the polyester resin slurry mixing and molding processes and their associated process equipment and exhaust systems are limited to 8.3 pounds per hour and 9.0 tons per year based on an emission factor of 0.02 pounds styrene emitted per pound of styrene used. The attached records indicate a total of 2.93 tons of styrene emitted, as of April 14, 2016. In total, Tech Line has processed a total of 146.56 tons of styrene for the year and operated for a total of 1,855 hours, which is less than the allowable 2600

hours. Records specifying total operating time, usage, and styrene emissions appear to be adequate. Additionally, stack dimensions, while not explicitly measured, appeared correct.

Compliance Determination

Based on the observations made during the time of the inspection and a subsequent review of the records, it appears that Tech Line is in compliance with PTI No. 253-95A and all applicable air quality rules and regulations.

NAME Kaitlyn D'Vine DATE 4/18/2016 SUPERVISOR PAB