

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

N714724073

FACILITY: DeWitt Barrels, Inc		SRN / ID: N7147
LOCATION: 1125 Comstock Street, MARNE		DISTRICT: Grand Rapids
CITY: MARNE		COUNTY: OTTAWA
CONTACT: Peter DeWitt, Vice President		ACTIVITY DATE: 01/09/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection. External facility observation includes a strong detergent type odor in the parking lot. Staff met with Michael DeWitt, President. Staff presented Mr. DeWitt with a copy of the DEQ Environmental Inspections: Rights and Responsibilities Brochure and discussed its contents. He introduced me to Timothy DeWitt and proceeded on a facility tour.

**FACILITY DESCRIPTION**

The facility is broken down into three main areas: intermediate bulk containers (IBC/tote) reconditioning, plastic drum reconditioning, and steel drum reconditioning. DeWitt Barrels is also able to provide new drums and totes to customers as needed.

Basically the totes and plastic drum reconditioning processes are similar and include manual labor. The dirty drum or tote comes in and proceeds to its respective wash line, where it is washed and rinsed inside and out. Next, the remaining water is removed from the interior via vacuum hose and the drum or tote is leak checked. If the leak check passed, the drum or tote is a viable product. If not, it goes through the process again. If the leak check is not passed a second time, the drum or tote is recycled.

The steel drum reconditioning line is mostly automated and starts out similarly with a cleaning and inspection process. The steel drum also gets an interior coat of rust inhibitor prior to vacuum hosing remaining liquids. The drum then goes to a shot blast to clean off any paint or other identifiable markings from a prior use. The drum then goes through the paint booth and drying oven. The spray booth utilizes one stack and the oven has two.

The paint booth draws paint directly from the paint kitchen and utilizes ~25 different color combinations. The air is recirculated through the booth through a series of baffles that are made of paper assembled to act as a filter. These are changed out regularly according to the maintenance schedule.

**COMPLIANCE EVALUATION**

The intermediate bulk containers (IBC/tote) reconditioning and plastic drum reconditioning processes have been identified by the company as being exempt from permitting via Rule 290. Recordkeeping has been provided and is attached.

Recordkeeping is maintained by Carol Langlois, and the facility continues to utilize the Emtrack system for calculating emissions and demonstrating compliance. A thorough review of the records indicate that while there were initially deficiencies, such as maintaining updated coating information to include minor formulation changes, these were promptly corrected. As such, no Violation Notice will be issued at this time.

PTI No. 134-02D

This PTI covers EUSPRAYLINE, and includes FGFACILITY, containing Opt-out limits for Hazardous Air Pollutants.

EUSPRAYLINE

## Emission Limits

The emission limits in the permit pertain to VOCs and toxics. Some have monitoring/recordkeeping requirements while others utilize general condition #13, or stack testing. That will not be required at this time.

VOCs are limited to 23.0 tons per 12-month rolling time period. 12-month rolling totals were available and emissions through November 2013 are reported at 10.51 tons. Acetone is limited to 2.0 tons per 12-month rolling time period. 12-month rolling totals through November 2013 are reported at 0.098 tons. With updated records the company states that there was "insignificant changes in VOC and constituent emissions." Dimethylethanolamine, CAS # 108-01-0 is limited to 22.25 pounds per calendar day. In the initial set of records received on November 7, 2013 daily emissions are reported at 22.26 pounds and indicates non-compliance. However, after updating the records with accurate material information, and a follow up record request by AQD, this number was reduced to 21.87 which now indicates compliance. Triethylamine, CAS # 121-44-8 is limited to 9.73 pounds per day. The facility reports that none of this has been used. Xylol CAS # 133-20-7 is limited to 139.03 pounds per day. The facility reports that 9.98 pounds were used for the month.

## MATERIAL LIMITS

VOC content of any coating used on the steel drum reconditioning line is limited to 3.5 lb/gal minus water as applied. A spot check of the coatings identified by product number as 190-2861, 190-2760, 190-2871 and 190-2001 indicates that updated MSDS's (SDS) needed to be obtained by the coating manufacturer. They were requested by AQD staff and indicate that some minor changes needed to be made to the recordkeeping which was done promptly.

Other material limits were compared between the permit and the updated SDS and were found to be in compliance.

## PROCESS/OPERATIONAL LIMITS

The facility reports no more than an 8 hour work day during November 2013. The review of updated SDS's indicate that there have been changes however no PTI updates are apparent. No concerns with storage of solvent were identified during the inspection, and there were no spent filters observed in the plant.

## EQUIPMENT

Exhaust filters appeared to be operating in a satisfactory manner, and Mr. Dewitt confirmed the use of pressure on the spray tips, and showed the gauge that monitors it. The line was not in operation to verify 10 psi during the inspection.

## TESTING

Facility has obtained prior written approval to utilize formulation data to determine VOC content.

## RECORDKEEPING/REPORTING/NOTIFICATION

The recordkeeping was in an acceptable format, and Ms. Langlois has labeled the information so that it was easy to find the information required by the permit. The facility immediately updated the current listing of the chemical composition of coatings. Future inspections will be conducted to determine whether the company has appropriately addressed this issue. All other recordkeeping is present and maintained in a satisfactory manner.

## STACK/VENT RESTRICTIONS

The permit lists two stacks, and the company has confirmed coating line has 2 stacks.

## FGFACILITY

## EMISSION LIMITS

Facility individual HAP emissions are limited to less than 9.0 tons per 12-month rolling time period.

Actual highest reported individual HAP emissions was diethylene glycol butyl ethyr at 0.13 tons. Facility aggregate HAPs are limited to less than 22.5 tons per 12-month rolling time period. Reported aggregate HAPs are 0.24 tons.

**TESTING**

Facility has updated the data being used to determine HAP content. Future inspections will be conducted to determine whether the company has appropriately addressed this issue.

**RECORDKEEPING/REPORTING/NOTIFICATION**

Facility is maintaining required HAP records in a satisfactory manner.

**CONCLUSION**

Following a thorough review of records, and additional requested information the facility demonstrated compliance.

NAME 

DATE 1-30-14 SUPERVISOR PAB

