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

FACILITY: SNOOK INC		SRN / ID: N8171
LOCATION: 6430 NORTON CENTER DR, NORTON SHORES		DISTRICT: Grand Rapids
CITY: NORTON SHORES		COUNTY: MUSKEGON
CONTACT: Matthew Schreiber, President		ACTIVITY DATE: 04/02/2019
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY'19 on-site inspec	ction to determine the facility's compliance status with	applicable air quality rules and regulations.
RESOLVED COMPLAINTS:		

AQD staff, Chris Robinson (CR), conducted an on-site scheduled unannounced inspection of Snook Inc. (Snook) located at 6430 Norton Center Drive in Norton Shores, Michigan on April 2, 2019. CR met with Mr. Jack DeHorn former owner/President. Mr. Matthew Schreiber is now the owner/President and main contact for this facility, but he was not available during this inspection. AQD identification was provided to Mr. DeHorn and CR announced intent to conduct an inspection of the facility in order to determine Snook's current compliance status with respect to applicable air quality rules and regulations. Mr. DeHorn provided pertinent information and a tour of the facility.

Weather conditions were partly cloudy with no precipitation, approximately 41°F with winds coming out of the southwest at approximately 12mph. CR surveyed the perimeter of the facility, upon arrival, for odors and visible emissions, none were observed.

FACILITY DESCRIPTION

Snook Inc manufactures rubber (neoprene) and silicone ducts, hoses, and connectors used in various industries for a multitude of applications such as exhaust gases from landfills and airplanes as well as various connectors.

There are currently no permits associated with this facility.

COMPLIANCE EVALUATION

The manufacturing processes is conducted in two different areas of the facility, one area for small diameter and length hoses and the other area for manufacturing larger hoses. The methodology for processing the hoses is the same, regardless of area, however components may be added to the smaller hoses to create various connectors. The base material is the same just on a smaller scale.

The basic process consists of coating a steel mandrel in mold release then wrapping it in either a neoprene or silicon rubber coated fabric. For added rigidity, copper or steel wire may also be used. Once completed, the whole thing is wrapped in a nylon belt and vulcanized in one of seven electric curing ovens. The have a heat rating of less than 10 MMBTUs/hr., therefore exempt from Rule 201 permitting requirements per Rule 282(2)(a) for electrically heated units with a heat input rate of no more than 10 MMBtus/hour. Curing consists of at least one cure at 300°F for 30 minutes. Some materials require a second cure at 350°F for 2-hours. The heating process vulcanizes, or hardens using heat, the silicon or rubber and creates a solid hose from the overlaps in the fabric. Based on records this appears to be exempt from Rule 201 permitting requirements per Rule 290, which requires the facility to demonstrate that monthly emission limits for this uncontrolled process is less than 1,000lbs/month. Along with the methanol-based mold release, the facility tracks the exact amount of materials used each month and calculates emissions, including each constituent of the fabric that could become an air contaminant during the curing process. Recordkeeping separates each applicable constituent depending on the allowable emissions. Based on the records provided for January 1, 2018 through March 31, 2019, methanol had the highest emissions reported at 201 pounds, which is well under the allowable limits. It should be noted that methanol usage is always reported as being 30 gallons per month which results in monthly emissions of 201 pounds. CR contacted Mr. Schreiber for clarification, Per Mr. Schreiber, the monthly usage is based on average weekly usage and monthly purchase orders, which is consistent from month to month.

Snook uses two (2) types of mold release. The one used most often is a combination of methanol and a lauryl sulfate-based soap (ORVUS) and on occasion a spray can mold release containing zinc Sterate Powder. The Spray cans appear to be exempt from Rule 201 permitting Requirements per Rule 287(2)(b).

The facility primarily manufactures silicone ducts, hoses, and connectors. However, they also do some urethane coating. The process involves coating/recoating guide wheels used to cut Styrofoam with urethane. Two different urethanes are used depending on customer needs and it must be mixed with a curative in order to cure

properly when heated. The urethane makes up the majority of the mixture and the wheels are heated to approximately 300°F. This process appears to be exempt from Rule 201 permitting requirements per Rule 287 (2)(c) for a surface coating process with a coating use rate of no more than 200 gallons per month. The facility used approximately five (5) gallons of urethane in the last year. This process is rarely done.

COMPLIANCE DETERMINATION

Based on observations, discussions and a records review, Snook Inc. appears to be in compliance with applicable air quality rules and regulations.

NAME

DATE SICA SUPERVISOR