

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

B165258301

FACILITY: Robroy Enclosures, Inc.		SRN / ID: B1652
LOCATION: 500 Maple St, BELDING		DISTRICT: Grand Rapids
CITY: BELDING		COUNTY: IONIA
CONTACT: Eric Faasen , Operations Supervisor		ACTIVITY DATE: 06/03/2021
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced on-site compliance inspection		
RESOLVED COMPLAINTS:		

Facility Description

Robroy Enclosures (Robroy) is a manufacturer of non-metallic electrical enclosures. The enclosures are made from fiberglass using a sheet molding compound (SMC) that is formed in heated presses to mold various size boxes. In early May 2021, the facility ceased making SMC onsite and now manufactures electrical enclosures from SMC received from an outside supplier.

The facility employs 83 workers and normally operates 5 days a week, 24 hours a day. Currently they are operating 6 days a week.

Regulatory Analysis

Robroy is currently a synthetic minor source for Hazardous Air Pollutants (HAP's) and holds one (1) permit, PTI No. 183-05E (opt-out permit). By taking opt-out limits, Robroy is not subject to the National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63 Subpart WWW for reinforced plastic composites production.

With discontinuing and removing the SMC operations (EUNESMCPROC), and previously discontinuing and removing EUTABLESAWDRILL and EUOLDSMCPROC, the only existing emission unit contained in the PTI No. 183-05E is EUCLEANSOLV. The facility will be evaluating the need to retain the permit. It is possible they may be able to exempt solvent usage and void the permit or have the permit modified to eliminate the removed emission units.

Compliance Evaluation

Prior to entering the facility a survey of the facility perimeter was made from the public right-of-way. No odors or visible emissions were detected from the facility.

At the facility , staff met with Erik Faasen, Plant Manager, Lee Van Bronkhorst, Operations Manager, and Dean Childs, SMC Operator. Mr. Van Bronkhorst accompanied staff on a tour of the facility and Mr. Faasen provided requested records (attached).

In response to COVID-19, proper PPE and social distancing was utilized during the inspection.

EUTABLESAWDRILL

This emission unit consists of a table saw and drill press controlled by a fabric filter unit. The equipment was previously documented to have been removed from the facility. During this inspection the facility stated that the emission unit has been removed.

EUCLEANSOLV

This emission unit consists of all cleaning solvents used for cleaning various process equipment located throughout the facility. The facility uses one cleaning solvent (S555). Volatile Organic Compounds (VOC's) are limited to 15.0 tons per year (tpy) on a 12-month rolling basis. As requested, the facility provided monthly and 12-month rolling records for the past 12-months. Ending in April 2021, the 12-month rolling VOC emissions were 1.23 tpy.

EUOLDSMCPROC

(Emission unit removed from facility)

FGSMC PROCESSES

This flexible group consists of both the old and the new SMC processes. Both the old SMC process (EUOLDSMCPROC) and the new SMC process (EUNEWSMCPROC) have been removed from the facility. Staff observed the locations where the processes were previously located. EUOLDSMCPROC was removed several years ago, EUNEWSMCPROC was recently removed.

Compliance was evaluated for EUNEWSMCPROC for the previous 12-months, prior to removal. The facility is required to maintain records of the usage rate of all materials containing HAPs and styrene on a daily basis, as well as records of the styrene content of raw material. The facility provided records documenting compliance with the recordkeeping requirements. Styrene emissions are limited to 5.7 pounds per hour. The facility provided records documenting compliance with the limit. Emissions were generally 2-3 pounds per hour on a daily average for the records reviewed.

FG FACILITY

This flexible group covers all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment. HAP's are individually limited to 9 tons per year (tpy) and aggregately limited to 22.5 tpy, both 12-month rolling.

The facility provided records documenting the highest individual HAP emission (styrene) ending in April 2021 to be 0.99 tons. The facility provided records documenting the total aggregate HAP emissions ending in April 2021 to be 1.00 tons.

EXEMPT EQUIPMENT AND MISCELLANEOUS OPERATIONS

The compression molding equipment is exempt from permitting under Rule 286(2)(b).

There are CNC machines exhausting to a common baghouse (Dust Demon V), which are exempt from Rule 201 permitting under Rule 285(2)(l)(vi)(b), as the baghouse is exhausted internally.

The facility has a CNC gasket operation. The foam in place acts as an adhesive coating, and is exhausted internally. This process is exempt from Rule 201 permitting under Rule 287(2)(a), which exempts adhesive lines that use less than 2 gallons per day and have emissions that are released into the general in-plant environment.

The facility also uses a two part epoxy to assemble large enclosures. The adhesive is exempt from permitting under Rule 287(2)(a), which exempts adhesive lines that use less than 2 gallons per day and have emissions that are released into the general in-plant environment.

Compliance Determination

Based on the observations and information obtained during this inspection, the facility appears to be in compliance with all applicable air quality rules and regulations at this time.

NAME Eric GrinsternDATE 6/14/2021SUPERVISOR 