

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

P033953334

FACILITY: SP INDUSTRIES		SRN / ID: P0339
LOCATION: 2982 JEFFERSON RD, HOPKINS		DISTRICT: Kalamazoo
CITY: HOPKINS		COUNTY: ALLEGAN
CONTACT: Adam Pool, Operations Office		ACTIVITY DATE: 03/06/2020
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On March 6, 2020 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 2982 Jefferson Road, Michigan at 10:30 AM to conduct an unannounced air quality inspection of SP Industries (hereafter SPI). Staff made initial contact with the office receptionist and provided her with a business card and stated the purpose of the visit. Adam Pool, SPI, Operations Officer, is the new contact and arrived shortly thereafter and took staff to his office for further discussions.

SPI designs and manufactures its own line of industrial and commercial grade compactors, pre-crushers, transfer station equipment, and cart dumpers to meet small to large capacity operations. SPI also takes on projects that are tailored to systems that handle wet waste, food products, metal scrap collection, fluid recovery, and newsprint recycling. The facility operates Monday through Friday with occasional weekends. Shop hours are typically 6:00 am – 2:30 pm, with office hours being 8:00 am – 5:00 pm.

SPI was last inspected by the AQD on April 12, 2012 and appeared to be in Compliance at that time with Rule 287(2)(c), Rule 285(2)(l), and Rule 285(2)(i). Staff asked, and Mr. Pool stated that the facility does not have any emergency generators.

Mr. Pool gave staff a tour of the facility. Required personal protective equipment are steel toe boots, hearing protection, and safety glasses. Staff observations and review of records provided during and following the inspection are summarized below:

Fabrication Building:

SPI's fabrication building is attached to the offices. This building is where the main body of the machines are fabricated. The facility uses jigs to construct the frames of the machines. Operations that are done in this building are metal cutting, drilling, grinding, and welding. Operations in this building appear to be exempt using Rule 285(2)(l)(vi)(B) for the metal cutting, drilling, and grinding equipment that only has emissions released to the general in-plant environment. The welding operations appear to be exempt using Rule 285(2)(i) which can be utilized for brazing, soldering, welding, or plasma coating equipment.

This building also has a large heated make-up air system. This unit is talked about more in the furnace/Gas-fired Air Make-Up Units section of the report.

Finishing Building:

This building is equipped with a COL-MET automotive style paint booth. The booth is fully enclosed and is equipped with fabric filters on the outlet exhaust. A dedicate paint storage room is also in the finishing building.

In the previous inspection the coating line located inside the finishing building was operating under Rule 287(2)(c). As a part of this exemption the facility must keep monthly records that show the coating use rate is not more than 200 gallons, as applied, minus water. The language also requires that a dry filter control or water wash control be installed and maintained.

During the inspection Staff reviewed monthly coating usage records since January 2018. Records included daily coating usages, name of the coating or reducer, and pounds of VOC emitted. During the records review Staff found that coating usage ranged from 36.74 gallons – 156.87 gallons in a single month. The largest coating usage occurred in June 2018. Staff acquired a copy of the June 2018 recordkeeping as an example of how

recordkeeping was being maintained. The monthly VOC emissions that SPI calculated for June 2018 was 701.8 lbs. Staff provided Mr. Pool with a copy of the Rule 287(2)(c) exemption and pointed out that this exemption does not require that VOC emissions be calculated. Staff did mention that it is helpful information but is not needed to demonstrate compliance if the facility has the recordkeeping that shows they are using less than 200 gallons of coatings per month as applied, minus water.

During the inspection Staff did observe the condition of the fabric filters that are installed onto the coating booth. All the fabric filters were in good condition with no rips or tears. Staff did request information on how often the filters are replaced. Staff was told that fabric filters are replaced on an as needed basis. Staff was also provided with invoices of the three most recent dates that fabric filters were replaced and installed. Dates of the invoices were 1/28/2019, 6/26/2019, and 11/22/2019. The facility appears to be properly maintaining the dry filter control associated with the coating booth.

The dedicated paint storage room does have its own exhaust that exhaust is discharged horizontally out the side of the building. The exhaust is equipped with fabric filter. Paint is stored in the original paint cans that they are purchased in. During the inspection the lids were covered to all the stored paints. During the inspection there were no odors observed near the exhaust.

Staff thinks that emissions from the paint storage room could be classified under the 287(2)(c) coating line. Staff noted that emissions are likely negligible and would be "double counted" in the in the coating line recordkeeping as that is based on paint usage. Staff also mentioned that exemption Rule 287(2)(k) has a possibility of also being utilized as this is for mixing, blending, or metering operations associated with a surface coating line.

Furnace/Gas-fired Air Make-Up Units:

SPI reported that at the time of the inspection the facility had eight natural gas fired furnaces and two heated Air Make-up system. These units range in max heat input capacity from 30,000 BTU/hour – 775,000 BTU/hour.

These furnaces and heated air make-up systems appear to be exempt under Rule 282(2)(b)(i) for fuel-burning equipment that is used for space heating which only burns sweet natural gas as fuel.

Cold Cleaner:

The facility did have one cold cleaner located in the Final Assembly building. Mr. Pool stated that he believes it was filled with mineral spirits. Staff was provided with the SDS sheet for the used solvent. The lid was covered during the inspection. The cold cleaner appeared to be in compliance with the Part 7 rules. Mr. Pool did indicate to Staff that the facility does not use the cold cleaner that much and had plans to take it home.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with the State of Michigan and Federal Air Quality Rules and Regulations. Staff stated to Mr. Pool that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 12:00 PM.-CJY

NAME Cody Yangzi

DATE 4/15/20

SUPERVISOR RIL 4/20/2020