FY2015 INSP

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

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FACILITY: ALTA Equipment Company	SRN / ID: U63130130 DISTRICT: Southeast Michigan COUNTY: OAKLAND ACTIVITY DATE: 09/22/2015		
LOCATION: 56195 Pontiac Trail, New Hudson			
CITY: New Hudson			
CONTACT:			
STAFF: Iranna Konanahalli COMPLIANCE STATUS: Compliance	SOURCE CLASS:		
SUBJECT: FY 2015 inspection of ALTA Equipment Company, Inc.			
RESOLVED COMPLAINTS:			

U63 13 0130 - SAR_ 2015 09 2Z

ALTA Equipment Company (U-63-13- 0130) fka ALTA Heavy Equipment Services, Inc. (U-63-13- 0130) 56195 Pontiac Trail, New Hudson, Michigan 48165-9702

December 2012 relocation: ALTA Equipment Company (U-63-13- 0130) moved from 28990 Wixom, Road, Wixom, Michigan 48393-3416 (A5118) to 56195 Pontiac Trail, New Hudson.

Name change (FY 2013): ALTA Lift Truck Services, Inc. →ALTA Equipment Company

Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations

On September 22, 2015, I conducted a level-2 self-initiated inspection of ALTA Equipment Company, Inc. (fka ALTA Heavy Equipment Services, Inc.), located at 56195 Pontiac Trail, New Hudson, Michigan 48165-9702. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Matt Mierzejewski (Phone: 248-356-5200-ext. 2570; Fax: 248-356-2029; Cell: 248-408-5281; E-mail: Matt.Mierzejewski@altaequipment.com)

About October 2014, Mr. Fred Peltier (Phone: 248-356-5200; Fax: 248-356-2029; Cell: 810—523-5747; E-mail: fred.peltier@altaequipment.com) transferred to ALTA Traverse City.

About 2012, Mr. Chris Colwell (Ph: 248-356-5200; Fax: 248-356-2029; E-mail: chris.colwel@altaequipment.com), Regional Operations Manager, separated from the company.

Alta Equipment Company's products include forklifts, wheel loaders, excavators, pavers, and materials handling products such as pallet racking, ergonomic equipment and modular building systems. The core brands include Hyster Lift Trucks, Yale Lift Trucks, Volvo Construction Equipment, CombiLift Fork Lifts, Link-Belt Cranes, Gomaco Concrete Pavers.

While New Hudson (U-63-13- 0130) location deals in heavy equipment, Wixom (N6319: ALTA Equipment Company, Inc., fka ALTA Lift Truck Services, Inc., 28775 Beck Road, Wixom, Michigan 48393-3637) location deals in lift trucks.

About December 2012, ALTA Equipment Company moved from 28990 Wixom, Road, Wixom, Michigan 48393-3416 (**A5118**) to New Hudson. SRN A5118 will be reassigned to new occupant.

N6319: ALTA Equipment Company, Inc. (fka ALTA Lift Truck Services, Inc.), 28775 Beck Road, Wixom, Michigan 48393-3637. Prior to February 2010, ALTA Lift Truck Services operated under SRN A5118 at 28990 Wixom Road, Wixom. Adept Plastic Finishing, Inc. removed all paint spray booths and robots and sold the building due to dire economic conditions in 2009. ALTA purchased the building and moved Lift Truck Services from 28990 Wixom Road, Wixom, to Beck Road. Adept's SRN N6319 is (CY 2010) reassigned to ALTA Lift Truck because the SRN belongs to this address. Adept continues to operate Plant Nos. 1 (no VOC control), 3 (booth and oven VOC control) & 4 (Cr⁺⁶ plating subject to Area Source MACT); Plant No. 2 does not exist anymore. Beck Road building is corporate headquarters for ALTA.

15 ft. W * 15 ft. H * 60 ft. D paint spray booth

One 15 ft. W * 15 ft. H * 60 ft. D GFS (Global Finishing Solutions) enclosed paint spray booth with filter systems at two corners is present. The booth is exempt from Rule 336.1201 (Permitto-Install) pursuant to Rule 336.287(c) because it is maintenance booth using less than 200 gallons per month. Paint and solvent usage logs are not kept. 15-50 gallons per month of coating and solvents are used based upon an estimate. Solvent based primer and yellow topcoat paints are used. Clearcoat coatings are not applied. Water based coatings are not used.

I asked Mr. Mierzejewski to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. Filters looked good during the inspection. Also, I asked him to keep paint and solvent usage records.

VOC laden exhaust gases are discharged via 35-foot-tall stack

Parts Cleaners

There are four parts cleaners or cold-cleaners or degreasers (Vic-Sol) at the service shop: 4 sink-on-drum type. No halogenated solvent is used. Only petroleum distillates with relatively low vapor pressure are used. Therefore, as halogenated solvents are not used, the cold cleaners are not subject to NESHAP for Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; Federal Register / Vol. 59, No. 231 / Friday, December 2, 1994).

A cold-cleaner is subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r) (iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

I asked Mr. Mierzejewski to ensure that the cold-cleaners are kept closed at all times when idled. During FY 2015 inspection I gave copies of DEQ's "cold-cleaner operating procedures for posting. The lids were open during FY 2013 inspection. However, mechanically assisted

lids were closed during FY 2013 inspection.

The lids are mechanically assisted. 4 parts cleaners are "sink on a drum" type; 55-gallon drum.

System-one that recovered clean solvent via filtration process was removed before the move. However, one Crystal-Clean Paint Gun Cleaning Service solvent recovery unit is present.

Solvent Zep, Inc. DYNA 143 Mineral Spirits – Petroleum Naphtha medium aliphatics (CAS 64742-88-7). Combustible Liquid. Specific Gravity = 0.79 at 60 °F. VP = 0.5 mm Hg at 100 °F. BP = 368 °F. FP = 143 °F Pensky-Martens CC Method. Flammability range = 1 (LEL) -7 (UEL) %. 100% VOC.

Conclusion:

Both I	locations	(Wixom	and New	/ Hudşon) us	se cold-clean	ers and paint	spray booths.	
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