

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

A589272884

FACILITY: GHSP		SRN / ID: A5892
LOCATION: 1250 S BEECHTREE ST, GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Eric Shake , EH&S Specialist		ACTIVITY DATE: 07/19/2024
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY '24 inspection to determine this facility's compliance status with respect to applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On July 19, 2024, Staff Chris Robinson (CR) from Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) conducted an inspection at GHSP (SRN A5892) located at 1250 South Beechtree Street in Grand Haven, Michigan. CR met with Eric Shake, provided identification, and informed him of the purpose of the inspection which was to determine GHSP's compliance status with respect to applicable air quality rules and regulations.

Weather conditions were approximately 70°F, fair with southwest winds at approximately six (6) mph (www.weatherunderground.com). The accessible portion of the facility's perimeter was surveyed prior to entry for odors and visible emissions, none were observed.

GHSP manufactures automotive transmission and shifter components. The facility does not have a Permit to Install (PTI), instead all equipment/processes utilize various Rule 201 permitting exemptions, which are discussed below.

Blank circuit boards are purchased, populated with components which are soldered to the boards using one of the several different soldering lines listed below, the boards are cut to size, coated with a conformal coating for corrosion protection, then assembled into or along with purchased metal components or plastic components manufactured onsite in one of the six (6) plastic injection mold lines listed below.

Soldering Lines: One (1) wave solder, four (4) regular surface mount (SMT) lines, and one (1) high speed SMT line. One of the SMT lines uses a lead-based paste. Per the Safety Data Sheet, the paste contains 30-40% lead. These lines appear exempt per Rule 285(2)(i) for soldering.

Injection Mold lines: one (1) vertical mold machine, one (1) 500-ton, and four (4) over-mold machines. A fifth over-mold line is in the process of being installed. These lines appear exempt per Rule 286(2)(b) for plastic injection equipment and associated plastic resin handling and storage.

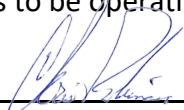
Each soldering line includes a router for cutting the circuit boards to size and an automatic enclosed sprayer for applying the conformal coating. Cutting of the circuit boards creates a minimal amount of dust which is collected by a dust collector that is vented to the in-plant environment only. Cutting of the boards appear exempt per Rule 285(2)(l)(vi)(B). Emissions from applying the conformal coating are captured in a filter which is also vented to the in-plant environment. The facility claims the coating process as exempt per Rule 287(2)(c) which limits coating usage from a single emission unit to 200 gallons per month. Based on records observed onsite, from January 1, 2024, through the date of this inspection GHSP used approximately 235 gallons of conformal

coating. The month with the highest usage was March at 55 gallons. GHSP appears to be operating well within the 200-gallon limit.

Isopropyl Alcohol (IPA) is used during assembly. IPA is kept in container and dispensed as needed to small plastic bottles located throughout the facility. This is then dispensed to a rag for cleaning. Used rags are kept in closed containers throughout the facility. Larger amounts of liquid waste are collected in containers for proper disposal. The facility claims IPA usage as exempt per Rule 290 with an emission limit of 1,000 lbs. per month. GHSP tracks the amount of IPA purchased and assumes 100% purchased volatilizes for emissions. Based on records for 2023, the total purchased in 2023 was 550 gallons. Assuming 100% volatilization, that would equal 3,534.1 pounds of emissions. However, the 2023 average monthly waste liquid collected was approximately 23 gallons (276 gallons total for the entire year). This equates to approximately 1,773.5 pounds of IPA that did not volatilize which reduces the worst-case annual IPA emissions to approximately 1,760.6 pounds. The monthly average would be 147 pounds, which is well under Rule 290's limit of 1,000 pounds per month. The IPA usage for 2023 is similar to 2024 so far.

The facility's maintenance area contains equipment used for cutting, grinding, and sanding which is exempt per Rule 285(2)(l)(vi)(B) and portable welders exempt per Rule 285(2)(i).

Based on the observations and discussions made during the inspection and records review, GHSP appears to be operating in compliance with applicable air quality rules and regulations.

NAME 

DATE 7/31/2024

SUPERVISOR 