

M3716
MANILA

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

M371658034

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| FACILITY: C L RIECKHOFF CO | | SRN / ID: M3716 |
| LOCATION: 26265 NORTHLINE, TAYLOR | | DISTRICT: Detroit |
| CITY: TAYLOR | | COUNTY: WAYNE |
| CONTACT: | | ACTIVITY DATE: 04/28/2021 |
| STAFF: Jill Zimmerman | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Target Inspection during stack test | | |
| RESOLVED COMPLAINTS: | | |

DATE OF INSPECTION : April 28, 2021
 TIME OF INSPECTION : 8:45 am
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Brian Rieckhoff
 FACILITY PHONE NUMBER : 734-946-8220
 EMAIL ADDRESS : brian.r@rieckhoff.com

FACILITY BACKGROUND

C.L. Rieckhoff Company, Inc. fabricates sheet metal into conveyor systems typically used for package sorting operations. Operations at this facility began in 1977. The facility is in a light industrial area. The facility operates one shift per day, five days per week.

REQUIRED PPE

I wore steel-toed protective shoes and safety glasses during the onsite inspection. Due to the COVID-19 virus, a health survey was required before entering the facility. A facemask was required during the onsite inspection.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received since the facility was last inspected on June 29, 2018. No violation notices (VNs) have been issued. The facility was found to be in compliance during the last onsite inspection.

PROCESS EQUIPMENT AND CONTROLS

Flat sheet metal and angles are formed through cutting, bending, and welding into the components which make up the conveyor system. Cutting of the metal is done using plasma cutters. Particulate emissions from the two plasma cutters are controlled by a fabric filter with a pre-cleaner and exhausted through two stacks on the roof. The parts are then coated using hand sprayers in one of two open paint lines. Paint line 1 is made up of 3 spray booths and

paint line 2 is made up of 2 spray booths. The paint lines are lined with dry filters and exhausted through an RTO before being release to the atmosphere. Coated parts are then allowed to dry in the open area before being shipped to the customer. All the coatings are solvent based. Xylol is a solvent used for clean-up.

INSPECTION NARRATIVE

I arrived at the facility to observe a schedule stack testing as required by PTI 381-97B. When I arrived onsite, the testing had already started. The test was administrated by Pete Romzick with GHD Services and was observed by Ms. Regina Angelotti, EGLE as well as me.

We walked through the facility to see the production firsthand. During the walkthrough, a part was being painted in the paint booth. Filters were present. I observed welding operations in the welding area, and the plasma cutter was being used. After seeing the painting process occurring in both paint lines, we discussed the testing process with the stack testers.

APPLICABLE RULES/PERMIT CONDITIONS

The paint lines are operating under permit 381-97B. FG381-97 consists of metal parts coating operations consisting of two paint lines operating under the conditions of PTI 381-97. This flexible group is for the operation of the associated equipment before the installation of the concentrator and RTO. FGRTO consists of metal parts coating operations controlled by a roto concentrator and regenerative thermal oxidizer. This flexible group is for operation of the associated equipment after installation of the concentrator and RTO.

The special conditions are evaluated below:

FG-381-97 was not evaluated because the RTO was installed on November 1, 2020 and was being tested during the onsite inspection.

FGRTO

- I. Emission Limits: NA – Twelve months of emissions records have not yet been collected since the RTO began operating. Based on the records submitted for the initial 7 months, it appears that the facility is operating under all permitted emission limits.
- II. Material Limits: NA
- III. Process / Operational Restrictions: Compliance – The malfunction abatement plan (MAP) was received via email on October 19, 2020. All wastes from the coating line are captured in a manner to minimize releases.

- IV. Design / Equipment Parameters: Compliance – The RTO was installed and appeared to be operating properly during the onsite inspection. Temperature gauges were present on the RTO as required by this condition.
- V. Testing / Sampling: TBD – During the onsite inspection, the facility was performing emissions testing, with results pending.
- VI. Monitoring / Recordkeeping: Compliance – During the onsite inspection, and proper records were being maintained. Because it has been less than twelve months with the RTO operating, twelve months of records were not obtained. A continuous temperature monitor was observed on the RTO. The collected records, including the monthly records for March 2021 are attached to this report.
- VII. Reporting: Compliance – The facility properly notified the department when they began operating the RTO.
- VIII. Stack / Vent Restrictions: Compliance – No modifications have been made since the stacks were installed to the specs required in this permit.
- IX. Other Requirements: NA – The RTO has been installed and was being stack tested during my onsite inspection. Therefore, the conditions being followed are for the FGRTTO.

FGFACILITY

- I. Emission Limits: Compliance – Although the facility has operated part of the last twelve months before the RTO was installed and rest of the twelve months with the RTO, the records collected during the onsite inspection show that the facility is operating with emissions much less than the permitted limits. A copy of the records are attached to this report.
- II. Material Limits: NA
- III. Process Operational Restrictions: NA
- IV. Design Equipment Parameters: NA
- V. Testing / Sampling: Compliance – The facility maintains a list of the HAP content of all coatings.
- VI. Monitoring / Recordkeeping: Compliance – The facility maintains all required records. A sample of the records are attached to this report.
- VII. Reporting: NA
- VIII. Stack / Vent Restrictions: NA
- IX. Other Requirements: NA

The two plasma cutters are exempt from permitting by Rule 285 (l)(vi)(C). The welding operations are exempt from permitting by Rule 285(i).

MAERS REPORT REVIEW

This report was received on time. The facility submitted additional information that supports the reported emissions.

FINAL COMPLIANCE DETERMINATION

C.L. Rieckhoff Company appears to be operating in compliance with all state and federal regulations as well as all permit conditions.

NAME 

DATE 6/17/2022

SUPERVISOR 