

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: Self Initiated Inspection**

U6309002855044

<b>FACILITY:</b> BELANGER, INC.		<b>SRN / ID:</b> U63090028
<b>LOCATION:</b> 22700 HESLIP, NOVI		<b>DISTRICT:</b> Warren
<b>CITY:</b> NOVI		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 08/24/2020
<b>STAFF:</b> Iranna Konanahalli	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> FY 2017 inspection of Belanger, Inc. ("Belanger")		
<b>RESOLVED COMPLAINTS:</b>		

**Belanger, Inc. (U-63-09-0028)****22700 Heslip Dr.****Novi, Michigan 48375-4143****[www.BelangerInc.com](http://www.BelangerInc.com)**

On August 24, 2020, I conducted a level 2 self-initiated **FY 2020 inspection** of Belanger, Inc., ("Belanger"), a car / truck wash systems manufacturing company, located at 22700 Heslip Dr., Novi, Michigan 48375-4143. 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 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the FY 2020 inspection, Mr. Bruce Gates (Phone: 248-374-4715- Cell: 248-613-5749; Fax: 248-348-6157; E-mail: bGates@BelangerInc.com), Production Supervisor, assisted me.

Ms. Sue Timmony (Phone: 248-374-4722; Cell: 248-789-0496; Fax: 248-380-8370; E-mail: sTimmony@BelangerInc.com), Director of Purchasing, Planning & Inventory, works from home. Mr. Dexter was not present as well.

**About July 2020, Messrs. Cary Dexter, VP Finance, Ron Guminik, VP Mfg., and Jeff Hodge, Production Supervisor, separated.**

**Founded in 1969, Belanger is in the business of manufacturing vehicle (car / truck, bus) wash systems via assembling parts. Both touch-free automatic and friction rollover car wash systems are assembled. Belanger assembles both car & light-duty truck and commercial vehicles (big-rig trucks, buses, etc.). At Novi, all manufacturing involves assembly only and the required parts are imported from supplier's facilities and Belanger's Northville facility. Belanger has two Michigan manufacturing facilities: while tunnel plant is located in Northville (72,000-square-foot facility), in-bay automatic facility is located in Novi (40,000-square-foot facility). Northville facility has machining center and paint spray booth. Only assembly work takes place at Novi. The car wash products are: Touchless In-Bay Automatic, Soft Touch In-Bay Automatic, Truck & Bus Wash, Fleet Tunnel Systems and Conveyorized Tunnel Systems.**

**There are several assembly areas:**

1. Electrical; some IPA (rubbing alcohol) is used for cleaning
2. Electrical subassemblies
3. Tire cleaning components
4. Wheel washing assemblies
5. Robots building and attendant subassembly (discontinued)
6. Pumping systems
7. Dryer systems
8. Conveyor systems

9. Packaging and shipping

Also, one test booth for testing assembly systems using water only is present.

**Aerosol spray can painting - 287(2)(b)**

All powder coating of structural parts is outsourced to Jackson Industrial Powder Coating (N0977) of Jackson, Michigan. No paint spray booth is present at Novi location; however, one is present at Northville facility (solvent-based paints).

As all structural parts are power-coated, for repair and touch-up purposes, aerosol spray cans are used: primer, enamel, topcoat. Few (<10) cans per month are used. All emissions are released to in-plant environment.

The aerosol spray can painting is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(b).

**Adhesives / gules application - 287(2)(a)**

Brush-on (100% transfer efficiency) glue application is performed using less than 2 gallons per month (<< 1 gallon / day). All emissions are released to in-plant environment.

The glue application process (s) is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(a) (<< 2 gallon / day limit).

**PVC Glue: Oatey PVC Heavy-Duty Clean Glue SPS #1102E (Oatey Co of Cleveland, OH; Phone: 216-267-7100)**

30-60% Tetrahydro furan (THF) (C<sub>4</sub>H<sub>8</sub>O CAS #109-99-9) FP > 230°F, BP = 66 °C; 10-30% Acetone (C<sub>3</sub>H<sub>6</sub>O, = CH<sub>3</sub>-CO-CH<sub>3</sub>CAS #67-64-1), FP = - 4 (negative)°F, Flammability Range = 2.5%v (LEL) – 12.8%v (UEL), BP = 133 °F, ρ = 0.785 kg / L at 25 °C; 10-30% Cyclohexanone (CAS #108-94-1), etc.

No cold / parts-cleaner is present. However, some iso-propyl alcohol (IPA usage: < 1 lb. / month) and water-based cleaning agents are used.

Only assembly areas are present. Glues, IPA / rubbing alcohol, aerosol spray cans, etc. are used. Assembly areas are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 or 336.1290 because all emissions are discharged into in-plant area or emissions are negligible. No painting using guns. No parts cleaner.

### **Conclusion**

Assembly areas (including aerosol spray can painting, adhesives / gules application, etc.) are exempt from Rule 336.1201.

NAME *J. S. Marshall*

DATE November 30, 2020

SUPERVISOR *Joyce*