

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

A016027239

FACILITY: VIKING CORP		SRN / ID: A0160
LOCATION: 210 INDUSTRIAL PARK, HASTINGS		DISTRICT: Grand Rapids
CITY: HASTINGS		COUNTY: BARRY
CONTACT: John Hippe, Corporate EHS Manager		ACTIVITY DATE: 09/25/2014
STAFF: Steve Lachance	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection for FY '014		
RESOLVED COMPLAINTS:		

This was an unannounced inspection. Prior to arrival at about 10 AM, 9-25-14, SL surveyed the area for odors and visible emissions attributable to the source; none were noted. Weather conditions were about 70 F, partly cloudy and calm.

The facility was represented by Mr. John Hippe, Corporate EHS Manager. Mr. Hippe escorted SL throughout the inspection. SL announced his intention to complete an Air Quality Inspection and shared the DEQ's "Environmental Inspections; Rights and Responsibilities" brochure. During the course of the entrance interview, SL also shared a copy of AQD Exemptions from PTI (Rules 278-290) with Mr. Hippe.

The facility manufactures, assembles and tests commercial and residential fire suppression systems. Operations are about 24/6, and the facility employs several hundred people.

This was SL's first inspection of the facility, and Mr. Hippe's first inspection with AQD at this site; he's been at the facility for about a year or so.

Having reviewed the file, SL outlined his understanding of regulated operations at the facility:

- Primary Paint Booth
- Aerosol Can Painting Operations
- Acid Dip Tank per PTI #358-96
- Testing facilities?
- Cold Cleaners?
- Engines?
- Heaters?

Per below, each of these items was addressed during the site walk-through. Per below, Mr. Hippe provided addition insight and detail into site operations with respect to Air Quality concerns.

Primary Paint Booth

The facility uses one (red) coating to spray coat a housing unit for their systems. See attached MSDS. The coating is applied as received and electrostatically deposited. The spray booth was observed in use. The booth captures overspray on replaceable filters. These were satisfactorily installed and are reported to be properly disposed. Each part is individually hung and sprayed and then air-dried. The operator maintains records at the booth of each change in barrel of paint used. At about 7 barrels per year used, and 53.5 gallons per barrel, the booth sprays on the order of 360 gallons per year; and certainly never as much as 200 gallons in a month. The booth is correctly identified as exempt from PTI requirements per Rule 287(c) based on coating usage and filter particulate control, in combination with records demonstrating low coating usage.

Aerosol Can Painting Operations (Element Spray Booth)

The facility has a vented, filtered booth where specific small parts are coated with one of three coatings from hand-held aerosol cans. Spent cans are collected and reportedly disposed of as appropriate waste. About two barrels of spent cans are collected per year. A small operation such as this is considered to be exempt from permitting requirements per Rule 285(hh).

Acid Dip Tank per PTI #358-96

Certain small parts are acid cleaned prior to connection to spray heads via automated lead soldering. The soldering operation is exempt per Rule 285(l), but the acid dip/treatment is subject to the requirements of PTI #358-96. These include visible emissions less than 10% opacity; proper disposal of wastes; tank covers; and exhaust through a 24"/20' stack. Each of these requirements appears to have been met; these are small/basket-sized "tanks", the operator seemed knowledgeable about the process (for which procedures were clearly posted), and required equipment (covers, ventilation, etc.) was in place.

Testing facilities

These range from a couple of laboratory hoods to a separate building for research on the equipment/systems under actual fire conditions. While Rule 283 allows for exemption of certain testing and inspection equipment, SL also discussed Rule 285(ee) for open burning (with the caveat of maintaining 20% opacity and not creating a nuisance; and also referred Mr. Hippe to our Fire Suppression Training Guidance at http://www.michigan.gov/deq/0,4561,7-135-3310_4148_55793-234562--00.html; trained firefighting personnel are always on hand during such performance tests involving live fire conditions

Cold Cleaners

At its core, this facility is a machine shop; there's lots of metal manipulation and fabrication of metal parts. Rule 285 offers various exemptions for machining and such, but SL anticipated the presence of Parts Cleaners. Several stations were noted, and these appear to use a bio-detergent as opposed to a regulated solvent. These are viewed as exempt per Rule 285(r), and in fact are probably not regulated units at all based on non-VOC cleaners. These were not explored any further.

Another cleaning station is located adjacent to the Primary Coating Booth and basically consists of a covered container of mineral spirits to remove overspray from tools, hooks, spray guns, etc. This container was further contained in a locking closet; and so any collecting vapors (from the mineral spirits VOC) are only indirectly released into the general plant environment. This hybrid purge/cleaning system is a small source of VOCs overall, but the most intense VOC odors were observed here. Post inspection, SL provided additional Cold Cleaner Unit requirement/procedure stickers for Mr. Hippe's potential use at his Michigan facilities.

Engines

One small emergency gen-set (natural gas) is located on-site and runs only for required periodic testing. This small engine is exempt from PTI requirements per Rule 285(g). Mr. Hippe was familiar with federal RICE rules.

Heaters

Space heaters in the facility are natural gas-fired and would be considered to be exempt per Rule 282(b)

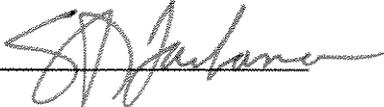
Fire Suppression System Charging

Small (<<500 gallon), customized system tanks are filled with a gaseous coolant/suppressant. This operation is considered to be exempt either through Rule 284(h) or Rule 285(ff).

Summary

The facility is classified by AQD as a "minor" source and that appears to be appropriate, but a formal Potential to Emit Determination has never been completed. Mr. Hippe has completed these elsewhere, and this task is on his radar so as to confirm Minor Source Status.

SL considers the facility to be in compliance with PTI #358-96, and available exemptions appear to apply to other production equipment. SL considers the facility to be in compliance with applicable air use requirements based on this on-site inspection.

NAME  DATE 9-26-14 SUPERVISOR 