DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

B516931024

FACILITY: WHITEHALL PRODUCTS LTD		SRN / ID: B5169
LOCATION: 8786 WATER ST, MONTAGUE		DISTRICT: Grand Rapids
CITY: MONTAGUE		COUNTY: MUSKEGON
CONTACT: Chuck Krzykwa , VP Manufacturing		ACTIVITY DATE: 09/03/2015
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced inspection		
RESOLVED COMPLAINTS:		

FACILITY DESCRIPTION

The facility is an aluminum foundry that manufactures decorative castings (weather vanes, home address signs, memorials, etc.)

REGULATORY ANALYSIS

The facility holds one permit, 142-07, which is an opt-out permit that limits potential emissions below major source HAP levels.

The facility currently does not melt any charge that is not defined as clean under Subpart RRR, and is therefore not subject to the requirement of Subpart RRR.

The facility's annual melt rate remains below 600 tpy, therefore they are not subject to Subpart ZZZZZZ.

COMPLIANCE EVALUATION

Prior to entering the facility a survey of the perimeter was made. No odors or visible emissions were noted.

At the facility staff met with a lead worker, who informed EG that Chuck Krzykwa, VP Manufacturing, was on vacation. Contact was made with Tim Swainston, purchasing and inventory, and Roger Buter, CFO, who arrived and accompanied EG on the inspection of the facility.

Mr. Swainston later provided requested records to EG.

Mold Making

The facility has a green sand molding system. Molds are made at nine mold making stations. Molds are placed on conveyors to be poured. No cores are used. Mold making is uncontrolled.

Melting

The facility has (4) 1,000 pound gas-fired crucible furnaces that melt pure ingot, internal runaround. Flux is used in the furnaces. Each of the furnaces has a stack ducting uncontrolled to the outside.

Pouring/Cooling/Shakeout

Molds are manually poured on the conveyors, where they are cooled. After cooling, the molds are shaken out in one of two shakeout units that move between the conveyors. The spent sand falls onto a conveyor that takes the sand to the reclaim unit. There is no emission control on P/C/S, which vents internally.

Sand System

Spent sand is processed through a rotary screen and then through a ring muller. The (uncontrolled) sand reclaim system is enclosed within the building and does not vent outside.

Finishing

The facility has the following finishing processes:

(1) tumblast unit - ducted to baghouse that vents outside. Various belt sanders, buffers, drills, cut-off saws - vent internally Table CNC - ducted to filter unit that vents internally in winter, outside in summer. Welding booth

All finishing processes are exempt from permitting at this time.

Review of compliance with PTI No. 142-07

1.2 Use clean charge only - per Subpart RRR.

Comment: The facility charges ingots and internal runaround.

Status: Compliant

The permittee shall not use more than 30 lbs of flux per day in FG-Furnaces. 1.3

Comment: The facility provided flux usage records for 2014 and 2015. Review of the records showed compliance with the usage limit.

Status: Compliant

1.4 The permittee shall keep records of the monthly tonnage of aluminum melted in tons per month, the hours of operation of FG-Furnaces on a monthly basis, and the daily usage rates of flux in pounds per calendar day. Such records shall be kept on file for a period of at least five years and made available to the Department upon request.

Comment: Staff reviewed 2014 and 2015 records documenting compliance with the requirement.

Status: Compliant

2.1(a) and (b) HAP emissions – Individual less than 9.0 tpy / Aggregate less than 22.5 tpy

Comment: Review of the records showed that emission totals equate to HAP emissions were below the opt out limits.

Status: Compliant

Based on the results of this inspection, the facility is in compliance with applicable air quality rules and

DATE 9/24/15 SUPERVISOR