

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

N554140896

FACILITY: TECH LINE PRODUCTS		SRN / ID: N5541
LOCATION: 950 W BROADWAY, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: David Ritchie , Safety Director		ACTIVITY DATE: 07/18/2017
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY '17 on-site inspection to determine the facility's compliance status with PTI No. 253-95A and other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD staff Chris Robinson (CR) arrived at TechLine Products (TechLine) located at 950 West Broadway in Muskegon, MI on July 18, 2017 at approximately 13:30 to conduct a scheduled unannounced inspection. CR met with Mr. David Ritchie, Safety Director, providing proper identification and informing him of intend to inspect for compliance with Permit to Install (PTI) No. 253-95A and any other applicable air rules and regulations.

Weather conditions were approximately 80°F with westerly winds at approximately 10 mph (www.weatherunderground.com). During this inspection, no visible emissions were observed and a slight styrene odor was detected in the facility's parking lot, located on the east side of the building.

#### **FACILITY/PROCESS DESCRIPTION**

Tech-Line uses polyester resins and various dyes and molds to manufacture bowling ball cores. The facility has approximately 20 employees, and operates one (1) shift, five (5) days per week.

#### **COMPLIANCE EVALUATION**

Tech-Line is a Title V opt-out source for a single HAP (Styrene) that has one (1) permit, PTI No. 253-95A. Tech-Line is not subject to any federal regulations at this time, including 40 CFR Part 60 subpart WWWW for reinforced plastics. This rule only applies to major sources of HAPs.

The bowling ball cores are manufactured in the front production building. This area houses the mixing room which contains two (2) mixing stations where dyes and colorants are added to the styrene and then poured into the individual molds. The molds are passed through an electrically heated drying oven (150°F). Each station is vented unobstructed vertically through the roof. The ovens appear to be exempt per Rule 282(2)(a).

Once the cores are removed from the molds they are de-burred drilled and then transferred to the warehouse for final finishing and polishing. The deburring and drilling machines appear exempt per Rule 285(2)(l)(vi)(C) and vent to a common baghouse located outside of the facility. Per discussions with Mr. Ritchi this baghouse is a pulse Jet with approximately 20 bags that are changed out approximately every four (4) months. A magnahelic gauge was present with a reading of 2.1" H<sub>2</sub>O. No visible emissions were observed and the area surrounding the baghouse was clean.

The warehouse consists of two (2) additional mixing stations, one with an electrically heated oven and one with no heating capabilities at all. These stations vent through a common stack vertically through the roof. The oven appears exempt per Rule 282(2)(a). Tech-Line also has several grinders, lathes, CNC's and a sand blaster in this area used for final finishing and polishing. Except for the CNC, all of this equipment is vented externally to a second common baghouse and appears exempt per Rule 285(2)(l)(vi)(C). No magnahelic gauge or visible emissions were observed coming from this baghouse. The CNC has its own standalone filter which vents to the in-plant environment and appears exempt per Rule 285(2)(l)(vi)(B).

#### **PTI No. 253-95A**

This permit covers the polyester resin slurry mixing and molding processes, and the associated equipment.

Tech-Line's PTI was issued in 1988 as a Title V Opt-out Permit for HAPs. The PTI does not contain any facility-wide restrictions (FGFACILITY), which has brought into question the validity of the permit. CR has discussed this concern with Mr. Wilbur and has reached out to AQD's permits section for a solution.

#### **- Special Conditions 13-17 (Limits)**

Tech-Line is subject to a plantwide emission limit of 8.3 lbs/hr or 9 tpy (based on 12-month rolling time period) for polyester resin. In addition, the facility is subject to a material limit of 900,000 lbs. of styrene per rolling 12-

month period and a maximum operational limit of 2,600 hours per year. Based on the records provided by Mr. Ritchie, which are included, the facility's 12-month rolling records for July 2017 indicate a styrene emission rate of 2.69 tons with a material usage of 134.55 tons and a total operating time, as of August 2017, of 1,761 hours. All limits specified in the permit appear to have been met. Testing was not requested during this inspection.

**- Special Condition No. 18 (Recordkeeping)**

- 18. The following attached records were provided complete and timely:
  - 1) Current list of all styrene containing material.
  - 2) Monthly amounts of each styrene containing material used and corresponding amounts of styrene used on % by weight of styrene in each material.
  - 3) Monthly amount of styrene used and emitted based on 2% loss as emitted of total styrene used.
  - 4) 12-month rolling average styrene emission calculations
  - 5) Monthly pounds of styrene used
  - 6) Monthly hours of operation

**- Special Condition No. 19 (Stacks)**

Exhaust gases were discharged unobstructed vertically to ambient air as required. CR did not explicitly measure any stacks, however visually the stacks appeared to meet the maximum diameter requirement of 20-inches and a height of 20-feet.

**MAERS**

CR spoke with Mr. Ritchie regarding MAERS submittals. In 2014, AQD determine that Tech-Line was no longer required to report to MAERS because the styrene (HAP) emissions had been below the 10 ton reporting threshold, which only applies to miner sources. Tech-Line must resume MAERS submittals starting in 2018 for 2017 emissions due to the facility's Title V opt-out status. Per AQD Policy AQD-013, all sources operating under an "Opt-out Permit" shall report to MAERS.

**Miscellaneous**

Tech-Line utilizes a small natural gas boiler (400 MBtu) for their snow melt system, which was installed in 2014. As discussed with Mr. Ritchie, this boiler appears to be exempt per Rule 282(2)(b)(i).

**COMPLIANCE DETERMINATION**

Based on observations and discussions during the inspection and a subsequent records review, Tech-Line Products appears to be in compliance with PTI No. 253-95A and other applicable air rules and regulations.

NAME Chris Robinson

DATE 8/30/2017

SUPERVISOR [Signature]