

PlanA

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

N834429498

FACILITY: EBW Electronics		SRN / ID: N8344
LOCATION: 13110 Ransom St, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: J. Cory Steeby, President		ACTIVITY DATE: 05/19/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, self-initiated inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility for an unannounced, self-initiated inspection and met with J. Cory Steeby, President. Mr. Steeby was presented with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed.

This facility was last inspected in November of 2009. At that time, the facility operated one wave solder line and four reflow (paste solder) lines and one conformal coat line. Now the facility operates one wave solder and 8 paste solder lines, plant cleaning solvent use and one conformal coat line. We discussed the similarities between the operations here and those at the former Invensys and currently at Gentex. I noted that those facilities kept track of emissions, and therefore so does EBW Electronics.

At the last inspection, AQD staff informed Mr. Steeby that it was the companies responsibility to keep record of facility emissions, however the company has not done so. I explained to Mr. Steeby that this is technically a violation of air quality regulations. However, since the actual usage is below regulated amounts, AQD staff would allow them another opportunity to initiate and keep track of emissions from this facility. Mr. Steeby was provided with a copy of the previous inspection report where this information had been documented.

Mr. Steeby was provided with the documentation on Rule 287(c) and Rule 290. It was explained and identified that Rule 287(c) exempt coating usage should be kept track in gallons as the rule requires. Emissions from Rule 290 exempt units must be kept in pounds. It was explained that Rule 290 is for any toxic air contaminant (ie. tin), Volatile Organic Compounds (VOC) and Lead. I informed them that I could run the numbers and determine whether or not there is any large compliance issues with the fact that each line is an individual emission unit and how many more can be installed without a permit.

Information was provided to me one week after the inspection. The information was incomplete as it did not contain the data sheets and usage for lead solder. Mr. Steeby provided that information on May 29, 2015. There does not appear to be any contaminants that are limited to less than the 1,000 lbs total per month.

Currently operating at this facility:

1 Rule 287(c) exempt emission unit- conformal coat

10 Rule 290 exempt emission units- cleanup and solvent thinning.

The VOC potential to emit (PTE) for the isopropanol is 60 tons. The conformal coat contains methanol which is a VOC and a Hazardous Air Pollutant. The PTE of methanol is

approximately 0.08 tons. It is unclear what the PTE of lead is, as there are likely equipment maximum capabilities that keep emissions low, and other similar and larger sources do not have any lead concerns. Actual emissions of lead using the highest content possible listed on the data sheets was calculated utilizing an emission factor of 0.05 pounds emissions per pound of lead used. 2014 emissions of lead were 146.3 pounds. There is a tin component to the leaded solder, which is also a regulated toxic air contaminant. The same emission factor was used, and emissions for 2014 were calculated to be 157.3 pounds.

If each solder line has a PTE of 6 tons of combined VOC and air toxics, and the facility is currently at a PTE of 60 tons VOC, they can install approximately 6 more solder lines before they hit the major source threshold of 100 tons VOC. This value would not include the addition of other sources of VOC like the conformal coat process.

I suggested to the facility that if they feel comfortable calculating the emissions on a monthly basis, they can do it on their own. However, there are environmental consultants available for hire, as well as the Environmental Assistance Center, to which I showed Mr. Steeby the phone number for on my card. It was explained that this is free non-regulatory assistance available through the DEQ in Lansing.

The facility needs to calculate emissions of VOC, HAP, Lead and other constituents listed. A routine evaluation of emissions and data sheets should be conducted to ensure accuracy.

At this time, it does not appear as though the facility has gone over any thresholds for exemptions or facility wide totals. However, monthly record of emissions must be maintained and made available upon request.

A future inspection will be conducted to ensure the facility is maintaining emissions records.

NAME

DATE

SUPERVISOR

Paul L. Lippard

6-2-15

PMB