

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

P021939090

FACILITY: Seal Bond		SRN / ID: P0219
LOCATION: 14851 MICHAEL LANE, SPRING LAKE		DISTRICT: Grand Rapids
CITY: SPRING LAKE		COUNTY: OTTAWA
CONTACT: Gerard Tejada , Plant Manager		ACTIVITY DATE: 03/27/2017
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to determine compliance with PTI No. 95-11C and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Monday March 27; 2017 AQD staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Seal Bond located at 14851 Michael Lane, Spring Lake, Michigan. The purpose of this inspection was to determine compliance with PTI No. 95-11C and all other applicable air quality rules and regulations.

KD arrived in the area at approximately 9:15 am, and surveyed the perimeter of the facility for any excess odors and opacity. None were noted. KD then proceeded to the facility and met with Mr. Gerard Tejada, Plant Manager, who accompanied KD on the tour of the facility.

### Facility Description

Seal Bond is a manufacturer of commercial/industrial grade adhesives, sealants, and coatings. The adhesive manufacturing is done via movable vessels of various sizes, which use liquid and solid materials to make the desired product.

### Regulatory Analysis

Seal Bond currently holds one (1) permit, PTI No. 95-11C.

### Compliance Evaluation

#### *FGADHESIVEMFG*

This flexible group comprises all of the batch processes for the manufacturing of adhesives. The process steps include charging/adding materials, blending, mixing, heating, cooling, the use of vacuum, and packaging. All of the processes in this flexible group are uncontrolled. The seven (7) emission units that are included in this flexible group are blending vessels are of various sizes, ranging from a 46 gallon capacity to a 530 gallon capacity.

Seal Bond tracks the amount of each material used in their products, as required by PTI No. 95-11C. Total dry solid material usage is limited to 2,830,000 pounds per year, 12-month rolling. As of February 2017, the dry sold material usage was 1,745,685.32 pounds. Similarly, total liquid and past materials are limited to 1,851,000 pounds per year, 12-month rolling. As of February 2017, the total liquid and paste material usage was 1,604,502.66 pounds. Chlorinated paraffin usage is limited to 441,000 pounds per year, 12-month rolling. Per the attached records, the 12-month rolling average for chlorinated paraffin usage was 166,287.74 pounds.

Batches also have material usage limitations. Batch limits include a 225 pound per batch limit for Silquest A-1120 DAMO-T, a 1200 pound per batch limit for Max 602, and a 20 pound batch limit for Troysan CP20. Batch records were reviewed confidentially, and supplemental records indicating usage of these constituents will be sent to AQD. The maximum batch usages over the past 12 months were 130.92 pounds, 392.75 pounds, and 0.00 pounds, respectively. Seal Bond is tracking the material usage on a per batch basis for the previously mentioned compounds, and for each material used in FGADHESIVEMFG.

#### *FGVESSELCLEAN*

This flexible group covers the use of clean-up solvent to remove product residue from the blending vessels and mixer blades on all of the seven (7) emission units. No open containers were noted during the inspection.

Per Mr. Tejada, mineral spirits are used to clean the vessels, and they are primarily cleaned in place. Clean-up

solvent usage is limited to 3,000 gallons per year, 12-month rolling. Records indicate that anywhere between 100 gallons and 300 gallons are used per month. As of February 2017, the 12-month rolling usage was 1,805 gallons. The calculated usage accounts for the amount of mineral spirits that is sent off site for re-processing. Based on the attached records, Seal Bond is adequately tracking the monthly usage of cleaning solvents, and the amount reclaimed. While KD did not explicitly measure the stacks, all stacks appeared to be of proper dimensions.

Seal Bond does not have any boilers, emergency generators, or cold cleaners.

After the inspection, on April 27, 2017, KD met with Mr. Tejada, Mr. Scott Carmichael, President, and Mr. Brian Greenwald, consultant at Barr Engineering to discuss the aforementioned batch recordkeeping. Since the Batch records are confidential, Seal Bond will separate out the three (3) materials that have specific batch limits into a separate report to be made available upon AQD request.

**Compliance Determination**

Based on the observations made during the inspection and a subsequent review of the records, it appears as if Seal Bond is in compliance with PTI No. 95-11C and all applicable air quality rules and regulations.

NAME Karlyn Davis DATE 5/1/2017 SUPERVISOR [Signature]