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

U41141409527731

FACILITY: Weller Reman Center		SRN / ID: U411414095
LOCATION: 3181 Broadway, Grandville		DISTRICT: Grand Rapids
CITY: Grandville		COUNTY: KENT
CONTACT: Tom Busman, Production General Manager		ACTIVITY DATE: 11/10/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Javier Unzueta. He was provided the DEQ Environmental Inspections: Rights and Responsibilities Brochure which we briefly discussed while waiting for his boss, Tom Busman, Production General Manager to return from lunch. The brochure was also briefly discussed with Mr. Busman.

This Weller Reman Center, remanufactures medium and heavy duty drivetrain components, such as transmissions and differentials. Activities conducted at this facility related to Air Quality include surface preparation of metals and painting done in one of 14 spray booths.

The facility operates metal surface preparation operations with either a caustic solution or a basic solution. The MSDS for each type of solution was reviewed while at the facility. This operation is exempt from permitting per Rule 285(I)(iii).

The facility operates several cold cleaners that are serviced by Safety Kleen. Mr. Busman was provided with the orange cold cleaner "stickers" to place on the lids of the units. All lids that were observed in the open position during the inspection, that were not currently in use, were immediately closed. These units are exempt from permitting per Rule 281(h).

I explained to the facility Rule 287(c), and the concept of Potential to Emit (PTE) with regard to the facilities 14 small spray booths. All observed filters were in good shape during the inspection. The facility only uses one coating in all the booths, a Red Oxide Primer by Pro Coatings, Inc. in Sparta. The MSDS identifies that the coating is high solids, low VOC, with a maximum of 0.86 lb VOC/gallon of coating. This coating is not thinned with solvent, it is used as it comes in 5 gallon buckets. The facility utilizes 200-300 gallons of coating per month. In this case, each booth would clearly fit into the Rule 287(c) exemption.

However, to properly conduct the PTE of this facility, we must multiply the 14 booths, each with a maximum coating use of 200 gallons. This equates to a facility maximum usage of 2,800 gallons per month. $2,800 \text{ gallons} \times 0.88 \text{ lb VOC/gallon} = 2,464 \text{ lbs potential VOC emissions per month}$. $2,464 \text{ lbs VOC} \times 12 \text{ months} = 29,568 \text{ lbs VOC per year PTE}$. 15 tons VOC PTE is below significance levels, and identifies this facility as a true minor source of VOC.

I explained the recordkeeping requirements of Rule 287(c) and provided the guidance document to the facility. I allowed that since the facility is at ~ 200 gallons per month total facility wide emissions that they can continue to track the usage in that fashion. The total usage was immediately available through purchasing records.

By this time, Matt Wilkinson, Production Operations Manager had joined us in our discussion of the facility emissions. Based on my initial observation of the constituents of the Red Oxide Primer, I was confident that this was a minor source of VOC, although we did discuss the possibility of a violation if the calculations provided otherwise.

As indicated above, this is a true minor VOC source which was in compliance at the time of the inspection.

NAME

DATE

11-12-14

SUPERVISOR

PMB