

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N065459437

FACILITY: C W MARSH CO		SRN / ID: N0654
LOCATION: 1385 HUDSON ST, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Dave Pruitt , President		ACTIVITY DATE: 07/01/2021
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On site air quality compliance inspection.		
RESOLVED COMPLAINTS:		

Introduction

On Thursday, July 1, 2021, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an air quality inspection of the C.W. Marsh Co. facility located at 1385 Hudson St. in Muskegon, Michigan to assess compliance with air quality regulations. This inspection was an un-announced, on-site inspection.

This facility manufactures leather gaskets, seals, washers, and other small leather products. Part of this manufacturing process includes impregnating the leather with rubber to increase its durability. This process includes treating the leather with solvent baths of toluene, methyl ethyl ketone, and B-Textile Spirits with rubber infused. After soaking, the leather is dried (sometimes with heat) to remove the solvents and leave only the rubber. This facility has three emission units. Two are dip processes that contain the aforementioned solvents, one of which has drying units that vent through a carbon bed scrubber and the other vents directly out of the facility. The one that directly vents to the external environment is considered a grandfathered unit. The other unit is exempt from air permitting regulations under Rule 290, as discussed below. The third emission unit is a band knife splitter with an attached bag house. The facility has one existing active Permit to Install (PTI) No. 665-83, which applies to the band knife splitter.

Inspection

Upon arrival, SE observed no odors or visible emissions around the perimeter of the facility. When entering the facility, SE was greeted by Gina Kittle (GK). After a brief discussion about the intent of the visit, a walking inspection of the facility was conducted. All permitted and exempt equipment was observed during this inspection.

PTI No. 665-83

This is the only active permit attributed to the facility. It is a minor source permit. There are three special conditions that apply to the facility, which are discussed below. It is worth noting, however, that under current air quality regulations, the equipment that is the subject of these special conditions (band knife splitter) meets the criteria for air permitting exemption Rule 285(2)(l)(vi)(B). As such, the facility could request that the PTI No. 665-83 be voided without jeopardizing compliance with air quality regulations. Exemption statuses are discussed in more detail below.

The three special conditions outlined in PTI No. 665-83 are:

- PM emissions limited to 0.10 lbs. per 1000 lbs. of exhaust.
- Visible Emissions limited to 20% opacity.
- Dust collector must be installed properly.

During the inspection it could be seen that the bag house dust collector was installed properly, however, this baghouse vents internally to the facility. As such, this equipment does meet the first two special conditions as well as meeting the requirements for air permitting exemption.

Rule 290

As mentioned above, the dip process tanks qualify for permitting exemption under Rule 290. The rule requires that VOC emissions be directly measured and reported to demonstrate compliance. Though the facility only records solvent used, and solvent sent off as waste, it is assumed that any solvent not sent as waste is emitted. This is acceptable. These records are kept for each of the two units separately.

Upon request, the facility provided the records for the period of January 1, 2021 to July 22 2021. These records included notes on materials added to dip processes and waste materials removed. It is assumed that all solvent not sent off site as waste is emitted during the drying process. Though there are two emission units, one grandfathered and one exempt, all solvent use and waste collection was recorded in a combined fashion. This is acceptable. The following analysis for January of 2021 was determined from the records and is representative of all months of operation at the facility.

- 48.5 lbs. of all solvents added to dip tanks in January of 2021.
- 889 lbs. of curing ingredients added to dip tanks in January of 2021.
- ~5% of dip tank contents were solvents.
- 41 lbs. of waste removed in January of 2021.
- Assuming 5% of dip contents being solvent, 2.05 lbs. of solvent removed as waste.
- 46.45 lbs. of solvents released as emissions.

This emission rate of 46.45 lbs. of VOC containing solvent emissions is below the 500 lbs./month limit established in Rule 290(2)(a)(i). This qualifies the units as exempt and in compliance with air quality regulations.

Conclusion

At the conclusion of the inspection, the facility appeared to be in compliance with the requirements outlined in PTI No. 665-83 as well as all other air quality regulations.

NAME Scott Evans

DATE 8/20/2021

SUPERVISOR HH