

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

N239849885

FACILITY: Holt Products Co		SRN / ID: N2398
LOCATION: 4200 Legion Drive, MASON		DISTRICT: Lansing
CITY: MASON		COUNTY: INGHAM
CONTACT: Richard Phillips, President		ACTIVITY DATE: 04/30/2019
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-initiated, unannounced compliance inspection.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author)  
 Other AQD Staff Present: Samantha Braman (AQD LDO) and Marina Ostaszewski (AQD Permits Section)  
 Personnel Present: Richard Phillips, President (rphillips@holtproducts.com)

**Purpose:**

Conduct an unannounced self-initiated compliance inspection of Holt Products, to determine if a paint booth permitted at this location under Thomas Fabrication was still present onsite. This facility location (4200 Legion Drive) has 3 suites with 3 different companies conducting business. Suite C, Applied Flooring, is the location where the Thomas Fabrication paint booth was located.

**Facility Background:**

Holt Products is a machine shop predominantly used for Harley Davidson. Richard Phillips, President, said that Holt Products has been leasing this space for 2 years out of their 5-year lease. They operate 2 8-hr shifts (6 a.m. – 10 p.m.), 5 days per week.

**Inspection:**

Samantha Braman, Marina Ostaszewski and I arrived at Holt Products at approximately 8:20 a.m. on April 30, 2019 and met with Richard Phillips, President. I provided R. Phillips with a January 2017 Permit to Install exemptions handbook and explained that the handbook discusses all emission units that do not require an air permit to install.

**Table 1.** List of equipment

Emission Unit Description	Exemption
CNC Lathes	Rule 285(2)(l)(vi)(B)
Screw-turn Parts Washer; rinses parts with Proguard Sparkleen	Rule 281(2)(e)

There is one emission unit at the facility that is questionable on what exemption it can operate under: the screw-turn parts washer, which uses Proguard Sparkleen as the cleaning agent to rinse oily and greasy parts. The cleaning compound contains triethanolamine (5% of solution) and monoethanolamine (10% of solution) (see attached SDS). The SDS specifies that there is no data for vapor pressure. Monoethanolamine has a vapor pressure of 0.2 mmHg, while triethanolamine has a vapor pressure less than 0.01 mmHg at standard conditions. There is no vapor pressure data available for the entire solution and therefore it can be assumed that the vapor pressure is negligible.

**Compliance Statement:** Holt Products appears to be in compliance with the state's exemption rules at this time.

NAME Marina Ostaszewski DATE 9/30/19 SUPERVISOR B.M.