

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

N277647647

FACILITY: REXAIR LLC		SRN / ID: N2776
LOCATION: 230 SEVENTH STREET, CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT:		ACTIVITY DATE: 01/16/2019
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Minor Source Compliance Inspection.		
RESOLVED COMPLAINTS:		

**Compliance Inspection**

On January 16, 2019 I conducted a compliance inspection of Rexair LLC located at 230 7<sup>th</sup> Street in Cadillac Michigan. The purpose of the inspection was to determine compliance with the Michigan Air Pollution Control rules. I met with Mr. Bruce Shaffer, V.P. Operations, and Mr. Stan Zaucha, Senior Manufacturing Engineer who accompanied me on the inspection of the plant.

The Rexair LLC facility in Cadillac is the manufacturer of the "Rainbow Cleaning System" an appliance used for multiple cleaning functions including floor and floor covering vacuuming and cleaning, dusting, air purification, and upholstery cleaning.

Operations at the Rexair Cadillac plant include the production of a variety of plastic parts using plastic injection molding and assembly of the appliance using the parts manufactured on-site as well as out-sourced parts. Additionally, there is a functioning air stripping groundwater remediation system that was previously operated under Permit to Install (PTI) 534-88A. The "wand washing" process previously permitted under PTI 1145-90 is no longer in place at the plant. This was confirmed by observation during the inspection, wand production is currently out-sourced.

PTI's 534-88A and 1145-90 were voided March 28, 2006 upon request from Rexair LLC in a letter dated March 14, 2006 and review by Air Quality Division (AQD) staff. The March 14, 2006 letter stated that reductions in the concentrations of TCE in the groundwater influent to the treatment system had reduced estimated air emissions to 0.9 lbs/month. At this emission level, Rexair LLC believed that the Rule 290 PTI exemption was applicable. AQD staff reviewed this request and authorized voiding PTI 534-88A.

As indicated in the March 14, 2006 Rexair letter, compliance with Rule 290 requires maintaining a description of the air stripping system, quantifying VOC air emissions in sufficient detail to demonstrate compliance with the Rule 290 monthly emission limits and maintaining records for the most current two-year period.

Records were not available at the time of the inspection but Rexair maintains records of water flowrate through the system for its NPDES permit and monitors the influent and effluent TCE concentration on a quarterly basis. Following the inspection Rexair provided records demonstrating compliance with the Rule 290 exemption (attached).

Rexair LLC's void request for PTI 1145-90 stated that the wand material had been changed from carbon steel to stainless steel and therefore the rust inhibitor that contained VOCs was no longer necessary. The new cleaner contained no HAPS or VOCs. This void request was also reviewed and authorized by AQD staff. The wand washing process has subsequently been eliminated since the parts are now produced off-site.

The plastic injection process utilizes approximately 30 injection presses that are vented outside via ductwork leading to the North side of the plant. During the inspection, we observed several of the presses and an injection cycle of one of the larger presses. No smoke was observed, plastic odors are present in the plant but the AQD has not received any odor complaints regarding Rexair LLC. Plastic injection molding has not previously been permitted, as it is addressed under the Rule 286 (b) exemption.

Rexair LLC operates an Electric Discharge Machining process on an as-needed, non-production basis to manufacture tools for the injection presses. This machining operation is addressed by the Rule 285 (I)(vi) (A) exemption.

Welding operations are conducted at Rexair as part of maintenance activities and are addressed by the Rule 285(i) exemption.

Rexair does not currently operate any coating, degreasing, cold cleaning, or electric generating processes. Plant heating is by natural gas fired space heaters, infra-red heaters and rooftop HVAC units.

As a result of the inspection, it appears that Rexair LLC is currently in compliance with the Michigan Air Pollution Control rules.

NAME 

DATE 6-22-19

SUPERVISOR 