

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

A040441336

FACILITY: GAST MFG CORP		SRN / ID: A0404
LOCATION: 2300 M139, BENTON HARBOR		DISTRICT: Kalamazoo
CITY: BENTON HARBOR		COUNTY: BERRIEN
CONTACT: Tony Martin , EH&S Manager		ACTIVITY DATE: 08/23/2017
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On August 23, 2017 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Gast Manufacturing facility located in Benton Harbor, Berrien County. According to file information, Gast Manufacturing has a number of paint booths being operated under the AQD Rule 287 (c) permit exemption and an air stripper for groundwater remediation being operated under PTI No. 173-04. The purpose of the inspection was to determine if the facility is complying with the permit exemption, their PTI, and any other state or federal air regulations. Staff departed for the facility at approximately 9:35 a.m.

Staff arrived at the facility at approximately 10:55 a.m. Staff went into the reception area but there was no one at the receptionist desk. Staff then noticed instructions on how to use the phone and the company directory to contact who they needed to see. Staff tried quite a few numbers but could not get anyone to answer. Staff then proceeded back outside to see if they could locate someone on the facility grounds who could assist them. Staff ran across an employee in a side parking lot, introduced them self, and mentioned that they needed to do an inspection but couldn't get in touch with anybody. The employee said he could assist staff and we proceeded back to the reception area. The employee asked staff to wait there and he would get someone for him. A little while later Matthew Whan (Director of Operations) came out to the reception area to greet staff. Staff introduced them self, gave Matt a business card, and stated the purpose of the visit. Matt then stated that Dave Livengood (Manger of Maintenance and Facilities) could assist staff. Matt stated that Tony Martin (EH&S Manager) could assist later but they were in the middle of a meeting with some corporate personnel. Matt then left to get Dave. A few minutes later Matt came out again with Dave. Staff again introduced them self and Dave asked what staff needed to see. Staff mentioned the AQD inspection process and that they would need to see the equipment in the facility as well as verify that they are complying with the Rule 287(c) permit exemption and the PTI for the air stripper. Dave mentioned that they don't operate the air stripper and that they contract everything involving that to a consultant (Arcadis). Dave mentioned that he could follow up with staff on contact information for Arcadis. Staff then asked if they could sit down somewhere and ask some general questions about plant operations prior to inspecting the plant. Dave said that was fine and led staff to a break room. The following is a summary of staff's discussion with Dave.

According to Dave, Gast Manufacturing's main business is the manufacturing of air compressors and air motors. He said that business has been pretty steady. He said that they employ about 300 people and they operate 20 hours per day (two 10 hour shifts) Monday through Friday. He said that any overtime is on the weekends. He said that they don't do any painting on 2nd shift. Staff then showed him the emission units listed in the previous inspection report and asked if they were still the same. Dave looked things over and said that all they have left at the facility are 5 paint booths with 2 being for UV paint, 3 booths for regular paint, along with the air stripper. Staff asked if any new equipment had been added and he said that they haven't. Staff then asked about cold cleaners and he said that they do have one and it is served by Safety Kleen. Staff then was about to proceed with Dave on a tour of the facility when Tony Martin came in. Staff introduced them self to Tony and Tony mentioned that he had taken over about 3 months ago for another EH&S Manager. Both he and Dave then led staff on a tour of the facility and the following is what staff observed.

Our 1st stop was at one of the paint booths used for applying regular paint. It was in use and they were

coating an air compressor motor. Dry filters were in place and looked good.

Note: The regular coatings are air dried at the facility and they have no cure or burn-off ovens. In the UV paint booths the coatings are dried by UV light. The three regular paint booths have a clipboard with a spreadsheet attached so the paint operators can document how much paint is used each day of the month and when filters are changed out. The three regular paint booths all have manometers as well with a note to change the filters when the differential pressure reaches 0.50 inches of water column. The UV booths have only one for tracking coating usage. They change the filters out at least weekly or as needed if volume increases. Staff observed a lot of mills, lathes, presses, etc. along the plant tour and this equipment is exempt from permitting.

Our 2nd stop was at a UV paint booth. It was not in use but it had a dry filtering system in place.

Our 3rd stop was at another regular paint booth. It was in use and they were coating a rotary main air compressor. Dry filters were in place and looked good.

Our 4th stop was in the milling area. They use to have 2 baghouses on the roof for handling the milling operations but are down to 1. Dave said they are looking to out-source the process and if they do they will get rid of that baghouse as well. The milling equipment is exempt from permitting.

Our 5th stop was at the building that houses the air stripper for groundwater treatment. Dave didn't have a key on him to get in so we proceeded elsewhere and returned later to check on the system.

Our 6th stop was at the last regular paint booth. It was not in use and staff was told it was used for painting miscellaneous parts. It has dry filters in place.

Our 7th stop was at the other UV paint booth. It was not in use but staff was told they use it for painting air motors.

After this stop, we proceeded back to Dave's office where he gave Tony the keys to the groundwater treatment building. Staff thanked Dave for his time and then proceeded with Tony back out to where it was located. The air stripper was in use and it's a tray type system. As mentioned earlier it is used for treating TCE. Tony mentioned that they might look to approach the DEQ's RRD about shutting the system down. According to Tony it costs about \$100,000.00 per year to operate and it's really not impacting TCE levels in the groundwater that much. He said that they would like to possibly go with natural attenuation.

Staff then proceeded back inside the facility and headed to Tony's office to look at records. Tony mentioned that he was still in the process of trying to find where the previous EH&S Manager had stored things either on computer or in file cabinets. Tony was having a hard time finding things but did locate some older files that showed they were tracking paint use. It appears that the facility doesn't use a lot of paint and staff asked Tony if he could put the monthly usage together for the past year or so in gallons per month and e-mail it to staff. He said he would. Staff thanked Tony for his time and departed the facility at approximately 12:45 p.m.

The following Monday (August 28th) Tony e-mailed staff their 287(c) records. The facility appears to be meeting the 200 gallon monthly limit required by Rule 287(c) (See Attached).

Staff had also e-mailed John McInnis of Arcadis after the inspection regarding the air stripper records. He also e-mailed staff back on August 28th with the records (See attached). The following is what staff noted in regards to the permit conditions.

VOC emission limit of 0.6 tons per year and TCE emission limit of 0.51 tons per year based on a 12-

month rolling time period. VOC emission limit of 0.13 pounds per hour. Records reviewed by staff indicated the most recent 12-month rolling time period for VOC and TCE emissions ending July 2017 were 0.03 tons and 0.016 tons respectively. The hourly VOC emission rate at its highest was 0.010 pounds per hour.

The facility is monitoring the flowrate, total VOC concentrations, and TCE concentrations of the air stripper influent and effluent streams as required.

The facility is recording the flowrate, total VOC concentrations, and TCE concentrations of the air stripper influent and effluent streams as required.

The facility is maintaining appropriate 12-month rolling time period records for VOC and TCE emission rates.

The stack appears to meet the requirements of 20 foot above ground level and 8 inches in diameter.

INSPECTION CONCLUSION: The facility appears to be in Compliance with the AQD Rule 287(c) permit exemption requirements as well as with the conditions contained in PTI No. 173-04 for the air stripper at the present time.

NAME Matt Desha

DATE 9-1-17

SUPERVISOR MA 9/5/2017

