

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

A211033559

FACILITY: PRAB CONVEYORS		SRN / ID: A2110
LOCATION: 5944 E KILGORE RD, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Dale Steinfeld , Plant Manager		ACTIVITY DATE: 03/02/2016
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced scheduled inspection. Staff (Monica Brothers) arrived at PRAB at 11:30am and asked for Mr. Steve Drag, who was the environmental contact for the last inspection in 2007, but the receptionist informed me that Mr. Drag doesn't work there anymore and has been replaced by Mr. Dale Steinfeld. Mr. Steinfeld met me in the lobby and we walked to his office to talk briefly before taking a tour of the facility. I gave him the inspection brochure and my business card and explained to him the process of the inspection and what records I would be expecting to see. I then asked him a few background questions about the facility.

Dale said that they have about 125 employees and run one 8-hour shift/day, Monday through Friday. PRAB produces material handling and chip and fluid management equipment. They make mostly conveyor systems, but also produce metal processing equipment like briquetters, filtration systems, magnetic separators, etc. Making these products mostly consists of exempt processes like metal cutting, machining, drilling, and welding (Rule 285 (l)(vi)(b) and (c)). However, they also have a paint booth that they operate under the Rule 287(c) exemption for single low-throughput paint booths. None of these processes require them to have a permit at this time. Lastly, I asked Dale if they had any boilers, emergency generators, or cold cleaners, and he said that they have one cold cleaner and a very small portable emergency generator for the computers, should the power go out.

Dale then took me on a tour of the facility. The company requires only steel-toed boots and safety glasses inside the production areas; however, hearing protection may also be a good idea, especially when certain cutting and machining processes are running. As we were heading over to examine the paint booth, Randy McBroom, Vice President – Manufacturing, introduced himself, and I asked him if he knows of any significant changes at the facility since the last inspection in 2007 that would impact air quality. He said no and that things have stayed very steady for the past few years, but he also mentioned that there were going to be some major changes in the near future.

He said that they had acquired another building close-by and that they would be moving some processes over there to give them more space to work. He said that there would also be another paint booth over in the new building, so I asked him if he had considered whether that would increase their solvent/paint throughput enough to require them to get a permit. Randy said that they were not planning on increasing production because of the new building, just simply spreading out more, so the current paint work would be split between the two paint booths and not increase the paint usage above the 200 gallon/month limit in the exemption. This should be investigated further upon the next inspection.

**Paint Booth (Rule 287(c) exemption):** Dale said that they typically only use the paint booth about 1-2 hours per day on average. The paint booth had all of the filters installed correctly and they appeared to be in good condition, despite needing to be changed sometime in the near future. They mostly use Binks SV100 HVLP Pressure Feed Spray Guns, but they also sometimes use DeVilbiss HVLP self-contained suction-feed guns as well. Dale explained that they use a solvent recovery machine to separate out the solids and reuse the solvent. They rent the small machine from SafetyKleen, which hauls away the solids for them when needed. The SafetyKleen model is a 710.3 Minimizer Solvent Recycler, but the actual manufacturer of the unit is Hedson Technologies with a model number of 10600. The unit is enclosed at all times and appeared to be in good working order.

I noticed a couple of open buckets full of liquid and asked Dale what they were, and he said that they were buckets of solvent waiting to be recovered. I told him that these should always have lids on them, so as to reduce the amount of solvent evaporating into the air. He said that he knows they should be covered and reminds employees all the time to do this, but sometimes they forget. Dale said he would keep a closer eye on it in the future. We then went outside to examine the stack for the paint booth. The

stack exits out a back wall and discharges downward. There was a fairly fresh layer of snow on the ground, so I could easily tell if there was any fallout or discoloration on the ground, which there was not.

Emergency Generator:

1. Portable and Gas-powered
2. 7000 Watt
3. Manufacturer: Briggs and Stratton
4. Model: Ex-Cell (EXGBVE 7010)
5. Exempt under Rule 285(g)

Cold Cleaner:

1. Safety-Kleen unit
2. Uses Safety-Kleen Premium Solvent (virgin and recycled). An MSDS was obtained
3. Non-heated
4. Lid was open when I saw it on the inspection, but it did not have any solvent in it at the time. Dale said that when it does have solvent in it, they keep the lid down when not in use.
5. Instructions were posted on the unit
6. Exempt under Rule 281(h) and Rule 285(r)(iv)

Recordkeeping:

I asked Dale for the past two years of paint and solvent usage. Usually, the combined total of both of these substances are around 100 gallons/month as applied; however there are a few months with totals around 150 gallons/month, with the highest total being 192.5 gallons/month in January 2015, which is extremely close to their 200 gallon/month limit. Dale explained that they do not take into account the solvent that they reclaim, and that reused solvent gets counted in their recordkeeping multiple times. This would keep them further under the 200 gallon/month limit than their records suggest, but increases in production in the future may require them to apply for a permit.

I asked Dale for the MSDSs for their paints, solvents, and mineral spirits that are used in the cold cleaner. The person that had access to those was not in at the time, so he simply emailed those to me the following day.

Dale printed off copies of the paint and solvent usage records for me, and I asked him about whether they still had baffle shields and filters on their cutting equipment because that is a requirement under the Rule 285(l)(vi)(c) exemption for externally vented equipment. He wasn't sure what that might refer to, so we went to Randy's office and asked him about it. Randy said that the only thing that was ever externally vented were the cutting tables that they hardly ever use anymore. He said that they used to do much more cutting than they do currently, and that they now have the majority of it done elsewhere before it comes to PRAB. However, upon inspection of the cutting table, the filter and baffle shield were still in place, just in case they ever do need to use it again for any reason.

I thanked Dale and Randy for their time and left the facility at 12:35pm. The facility seems to be in compliance at the time of this inspection.

NAME

*M. M. M.*

DATE

3/3/16

SUPERVISOR

MA 3/4/2016