

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

A422742396

FACILITY: AMERICAN GREASE STICK CO		SRN / ID: A4227
LOCATION: 2651 HOYT, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Jamie Ardis , Product Data Manager Marketing Coordinator		ACTIVITY DATE: 11/14/2017
STAFF: Chris Robinson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY18 scheduled unannounced inspection to determine facility's compliance status with applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

American Grease Stick (AGS) (SRN A4227) is located at 2651 Hoyt Street, in Muskegon, Michigan. AQD staff Chris Robinson (CR) arrived at this location at approximately 10:30 am on Tuesday November 14, 2017 to conduct a scheduled unannounced inspection to determine the facility's compliance status with applicable air quality rules and regulations. The facility has no active or voided permits with the AQD, Equipment has been operated either under "grandfathered" status or a Rule 201 permit Exemption.

Weather conditions were approximately 43°F overcast with southerly winds. CR met with Mr. Lind Thompson, Maintenance and Ms. Jamie Ardis, Product Data Manager and Marketing Coordinator, announcing intent to inspect and providing proper identification. Mr. Thompson and Ms. Ardis generously provided a tour of the facility as well as pertinent information. No visible emissions or odors were observed.

FACILITY DESCRIPTION

This facility manufactures lubricants primarily for the automotive industry. On-site processes include storage, mixing and packaging of lubricants such as brake fluid and lubricant and cutting and grinding fluid. In addition, AGS manufactures various types and sizes of brake lines via machining processes.

COMPLIANCE EVALUATION

As stated above, AGS does not have any active or voided permits with the AQD. Equipment has been operated either under a "grandfathered" status or a Rule 284(i) Permit Exemption, which is discussed below.

Tank Farm

The facility stores raw ingredients in storage tanks or totes with a capacity ranging from between 50 gallons to 10,500 gallons. Except for the totes, the tanks are filled from the outside via filling lines. Based on visual observations during the inspection as well as information received from Mr. Thompson and Ms. Ardis, tank information and contents is provided in the table below.

Part #	CAS #	Description	Size of Tank in Gallons	Comments
0000111	8001-79-4	FNO Caster Oil	10,500	Active
0000190	64742-52-5	Cutting and Grinding Oil	10,500	Active
0000440	8052-41-3	Naptha 100	10,500	Active
0000560	025322-68-3	Polypropylene Glycol 2000	8,600	Active
0000580	64742-53-6	Power Steering	10,500	Empty - No longer used
0000660	64742-52-5	Nap 500	10,500	Active
0000670	64742-52-5	Nap 100	10,500	Active
4000010	61789-97-7	Coconut Oil 76% Refined	10,500	Active
4000020	7732-18-5	Caustic Potash Liquid 45%	8,000	Active
4000030	107-21-1	Ethylene Glycol	8,560	Active
--	--	Trichloroethane	10,000	Empty - No longer used
0000970	--	Brake Fluid	50-gallon totes	Active

Per discussions with Mr. Thompson and Ms. Ardis, during the inspection, these storage tanks were installed prior to 1967, which would be considered "grandfathered". However, a 1989 AQD activity report indicates that changes were made to the tank farm and that at the time AGS believed that their consultant had applied for a permit. In addition, since, at least 2001, Rule 284 exemption, defined below, has been used for the tank farm.

Since an exemption has always been utilized and there is some indication that the tanks were possibly modified after 1967 and recognition by both the AQD and AGS that a permit may have been required at that time, the tanks cannot be considered "grandfathered" unless supporting documentation is provided.

Email Follow-up correspondence from Ms. Ardis and Mr. Thompson indicated that the tank farm was not installed until at least 1980, therefore, not "grandfathered". Email correspondence is included in **Attachment B**.

In addition, Rule 284 currently and historically states:

"Storage, mixing, blending, or transfer operations of volatile organic compounds or non-carcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions."

The facility provided safety data sheets for all material used on-site (**Attachment A**). A brief review of the SDS's for the raw ingredients used in the tank farm indicate many unknown vapor pressures and carcinogenic information. Carcinogenic and Hazardous Air Pollutants (HAPs), noted below, were also identified.

Carcinogenic:

Cumene and Ethylbenzene in the Naptha Mineral Spirits.

HAPs:

Ethylbenzene in the Naptha Mineral Spirits.

Ethylene Glycol.

Rule 284 exemption cannot be utilized for equipment or processes with unknown vapor pressures and/or carcinogenic liquids. Rule 284 appears to work for tanks Nap 100, Nap 500 and Caustic Potash only.

The remaining tanks may also be exempt from Rule 201 permitting under Rule 284, however, AGS must further evaluate applicability and submit supporting documentation to the AQD. At this time, this is considered a violation of Rule 201.

Compounding Area

This area is used to fill tubes with a solid substance, primarily lubricant. Some of the products manufactured on this line are waxes that are heated to melting before they are compounded. Some of the products filled on this line include Ruglyde, belt ease, drip-less oil and dielectric grease. This line is also used to fill 55-gallon drums with Silglide brake fluid for resale. The Silglide is stored in a tank and pumped into drums. This line can also fill smaller containers with products such as air compressor lubricant and cutting and grinding oils. Based on discussions with Mr. Thompson and Ms. Ardis and noted in the previous inspection report, equipment in this area was installed prior to 1967, therefore considered "grandfathered" and not required to be permitted.

Oden Line

The newer line is a semi-automated line used to fill various sizes of containers from 4-ounces to 1-gallon. Per discussions with Mr. Thompson and Ms. Ardis this line was most likely installed in the late 1970's or early 1980's, therefore not considered to be "grandfathered" and subject to permitting. Products filled at this line include Ruglyde and silicon brake fluid. This line may be exempt from Rule 201 permitting, but would require documentation. For now, this is a violation of Rule 201.

Gallon Line

The gallon line is manually operated and used to fill gallon sized containers of Ruglyde and silicon brake fluid. Per discussions with Mr. Lind and Ms. Ardis, this line has not operated in some time and is not expected to be used in the future and will most likely be removed. The line appeared to still be operational, therefore subject to air quality rules and regulations. As noted in the previous inspection report and re-confirmed by Mr. Lind and Ms. Ardis, the gallon line was installed prior to 1967. Therefore, considered "grandfathered" and not required to be permitted.

Brake Line Manufacturing

As mentioned above, AGS manufactures several different types and styles of brake lines. All of the components used to assemble the lines are manufactured and purchase from a separate off-site facility. Assembly processes include crimping, cutting and flaring of either metal or rubber lines. No emissions are generated during assembly. Therefore, these processes and equipment are not subject to any air quality rules or regulations.

Miscellaneous Equipment

- Cold Cleaner

The facility utilizes one non-heated or agitated cold cleaner containing Naptha100. Naptha100, unfinished goods, is stored in a 10,500-gallon storage tank, discussed above, and used by AGS for finished goods. During this inspection the lid was closed with no instructions posted. An instruction sheet was provided by CR. This parts cleaner appears to be exempt from permitting per Rule 281(2)(h) for cold cleaners with an air/vapor interface of not more than 10ft².

- Boilers

There are two natural gas-fired only boilers in use at AGS, one for warming the coconut oil and one for heating the facility. The National boiler used for heating the facility was rated at approximately 1,200,000 BTU/hr and, as noted by Mr. Lind, installed prior to 1967. Although this boiler is most likely considered "grandfather", it would also be exempt per Rule 282(2)(b)(i) for natural gas-fired boilers rated at less than 50,000,000 Btu/hr. The Utica boiler, used for warming coconut oil, is rated at approximately 400,000 Btu/hr. Mr. Lind was unsure of the exact installation date but thought it was installed in the 1990's. Taking that date into consideration the boiler would not be considered "grandfather" but appeared to be exempt from permitting per Rule 282(2)(b)(i) also.

- Label Printers

The facility uses three thermal zebra printers for applying dates to pre-printed labels or for printing basic black text labels. These printers appear to be exempt from permitting per Rule 285(2)(l)(vii)(B).

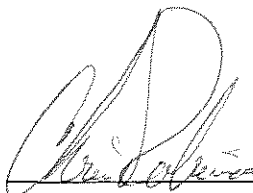
COMPLIANCE DETERMINATION

Based on observations and discussions made during this inspection as well as a review of Safety Data Sheets, American Grease Stick does not appear to be in compliance with applicable air rules and regulations at this time. Michigan Air Pollution Control Rules, Rule 201 requires a facility to obtain a permit to install (PTI) unless the process or process equipment was installed and unmodified since 1967 or is considered exempt. A violation notice will be issued. A facility-wide Potential to Emit for volatile organic compounds (VOC's) and hazardous air pollutants (HAPs) will also be requested.

Attachments

- A) CD of Safety Data Sheets
- B) Email Correspondence

NAME



DATE

1/12/2018

SUPERVISOR

