

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

A644433210

FACILITY: Midwest Rubber Company		SRN / ID: A6444
LOCATION: 3525 RANGELINE RD, DECKERVILLE		DISTRICT: Saginaw Bay
CITY: DECKERVILLE		COUNTY: SANILAC
CONTACT: Rick Bezemek , Environmental Management Rep		ACTIVITY DATE: 02/03/2016
STAFF: Sydney Bruestle	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite inspection to evaluate compliance with Active PTIs: 383-86, 387-86, 388-86, 196-87, 567-94,373-97, 375-97A,376-97, 259-04, and 276-06		
RESOLVED COMPLAINTS:		

On February 3, 2016 I (Sydney Bruestle) conducted an onsite inspection of Midwest Rubber Company located at 3525 Rangeline Road in Deckerville, Michigan. I met with Rick Bezemek (Manufacturing Manager) and Janet Brown (Environmental Manager). Midwest Rubber Company has 10 active permits one of which is a Title V opt-out permit (PTI 276-06) for Hazardous Air Pollutants (HAPs).

Facility Description:

Midwest Rubber Company operates several different coating lines. These include neoprene dip coating, plastisol dip coating, and slush coating (heated salt treatment). Aluminum mandrels are created as a mold to form the rubber.

During the neoprene dip coating, the mandrels are first dipped into a coagulant/lubricant (at room temp), then dipped into a neoprene coating for various amounts of time depending on the necessary thickness of the product. The products are then cured in an oven.

For Plastisol dip coating the mandrels are first heated to temperatures between 375-600 degrees F. The parts are then cured in an oven ranging from 375-600 degrees F.

Slush molding uses a hot salt solution for the curing of plastisol. The mandrels are filled with plastisol then dipped into the heat treated salt for various amounts of time depending on the desired thickness of the part, some plastisol is poured off and the mandrel is dipped back into the salt bath. The part is then removed from the mandrel and is placed on a vertical conveyor system to allow the part to cool.

Compliance evaluation:

PTI 383-86:

This PTI covers tumble dryers, These were not being operated when I was onsite. There were no materials/emission limits associated with this PTI.

PTI 387-86:

Plastisol Fusion Ovens 8,9,&10.

Emission Limits: VOC: 3.49 lbs/hr 7.26 tons per year (TPY)

Actual: 12 month rolling (January 2015-Dec 2015) : 0.11 TPY

*Midwest Rubber didn't have a calculated hourly VOC emission rate, however they do track VOC emissions and hours of operation for each month and are able to calculate a rate. Midwest Rubber will calculate an hourly rate moving forward.

Records were reviewed onsite and some records are attached.

PTI 388-86

This permit covers several ovens, there were no visible emissions from the truck part ovens. There were no materials/emission limits associated with this PTI.

PTI 196-87

This PTI covers curing oven 11, which is used in the plastisol dipping process.

Emission Limits: VOC: 3.78 pounds/hr 14.2 TPY

Actual Emissions: 12 month rolling (January 2015- January 2015): 186.9 pounds= 0.09 tpy

*Midwest Rubber didn't have a calculated hourly VOC emission rate, however they do track VOC emissions and hours of operation for each month and are able to calculate a rate. Midwest Rubber will calculate an hourly rate moving forward.

Records were reviewed onsite and some records are attached.

PTI 567-94

This permit covers plastisol fusion ovens 12 & 13.

Emission Limits: VOC 3.0 pounds/hr 11 tons/year

Actual Emissions: 12 month rolling time period (January 2015-December 2015) 926.25 lbs/year = 0.46 tpy

*Midwest Rubber didn't have a calculated hourly VOC emission rate, however they do track VOC emissions and hours of operation for each month and are able to calculate a rate. Midwest Rubber will calculate an hourly rate moving forward.

Materials Limit: 0.01 pound VOC per pound of plastisol material used (1% by weight).

Actual: All plastisol used on these units contains 1% VOC or less.

Records were reviewed onsite and some records are attached.

PTI 373-97

This permit covers latex curing ovens 14, 15, and 16. These were not operated in 2014 or 2015 and had zero VOC emissions for both years.

Emission Limit: 1.1 pounds/hr 3.2 tpy

Records were reviewed onsite and some records are attached.

PTI 375-97A- Non Compliance

This permit covers plastisol dip tanks and lab ovens located in Cell 39.

Emission Limits: VOC 2.97 tpy (12 month rolling time period)

Actual emissions: (January 2015-December 2015) 0.18 tpy

Materials Limits: Plastisol usage: 594,432 lbs/yr (12 month rolling) VOC content in plastisol cannot

exceed 1 percent by weight.

Actual usage: 24,715.22 lbs (January 2015-December 2015) The VOC content exceeded 1% for 4 different plastisol coatings used on this line (LA-396 Red, LA-396 Gray, LA-396 black, LA-396 Cool Gray). A violation notice was sent February 5, 2016.

Records were reviewed onsite and some records are attached.

PTI 376-97

This permit covers Salt lines 1, 2, and 4.

Emission Limits: VOC 2.42 lbs/hr 7.6 TPY

Actual Emissions: (January 2015- December 2015) for all three lines 0.37 tpy

***Midwest Rubber didn't have a calculated hourly VOC emission rate, however they do track VOC emissions and hours of operation for each month and are able to calculate a rate. Midwest Rubber will calculate an hourly rate moving forward.**

Actual Usages: (January 2015- December 2015); (January 2014-December 2014)

SL1: 11,893.53 lbs ; 18,508.97lbs

SL2: 49,589.03 lbs; 50,332.89 lbs

SL4: 0 lbs ; 0 lbs

Hours of operation is kept for each line (reviewed onsite).

Records were reviewed onsite and some records are attached.

PTI 259-04- No-Compliance

This permit covers cell 99 (coating booth and associated curing oven). Water based coating is applied to plastisol skin covered urethane parts.

Emission Limits: VOC 18 tpy

Actual Emissions: (January 2015- December 2015) 0.13 tpy

Materials Limits: VOC content of materials is limited to 3.2 lb/gal

Actual VOC content: Two materials used in EUCOAT1 Cell 99 exceeded the 3.2 lb/gal VOC content limit (F-789 Clear Primer and F-892 Top Coat). A Violation Notice was sent February 5, 2016.

Waste and filters are properly stored and disposed of. Exhaust filters were installed and an HVLP spray gun is used.

Records were reviewed onsite and some records are attached.

PTI 276-06

This permit covers EU-CL-05, a natural gas heated type plastisol casting line consisting of a chain conveyor that carries castings through filling stations, a curing oven, a cooling area, and a dispensing

station.

Emission Limits: VOC 1.8 tpy (for EUCL05)

Facility Wide emission limits:

Each individual HAP: less than 9.0 tpy

Aggregate HAPs: less than 22.5 tpy

VOC: less than 90 tpy

Actual Emissions: EUCL05: 0.18 tpy

Facility wide: HAPs (individual): 0.000942 tpy

HAPs (combined): 0.000942 tpy

VOCs: 3.71 tpy

The Facility has several pieces of equipment using PTI exemption rule 290. The company tracks emissions from each of these units and monthly emissions are below 1000 pounds per month. 2015 records are attached.

Midwest Rubber Company was in violation of PTI 375-97A special condition II. 2. and PTI 259-04 special condition I.2., VOC contents of materials being used exceeded the limits present in the permits. A violation notice was sent on February 5, 2016. At the time of my inspection Midwest Rubber Company was found to be in compliance with all other permits and air quality rules.

NAME S. J. P. M.

DATE 02/08/16 SUPERVISOR C. Blue