

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

B430030980

FACILITY: SAF-HOLLAND, INC.		SRN / ID: B4300
LOCATION: 1950 INDUSTRIAL BOULEVARD, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: John Norton , Controls Engineer - Manufacturing Engineer		ACTIVITY DATE: 08/20/2015
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to determine compliance with Permit No. 06-02 and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On August 20, 2015 AQD Staff Kaitlyn DeVries conducted an unannounced scheduled inspection of SAF Holland, located at 1950 Industrial Blvd, Muskegon Michigan. The purpose of this inspection was to determine compliance with Permit No. 06-02 and all other applicable air quality rules and regulations. Staff arrived at the facility at approximately 12:45 pm. Prior to entry, staff observed the facility and did not observe any visible emissions or odors. Staff met with John Norton, Controls Engineer/Environmental Contact. The Environmental Rights and Responsibilities pamphlet was distributed and briefly discussed with Mr. Norton. Currently, SAF Holland only has the one permit (PTI No. 06-02), but also utilizes multiple Rule 201 permitting exemptions. Mr. Norton asked KD regarding the status of this permit as he thought it had been voided. Upon investigation of the e-mail he received from AQD Staff, the permit is still valid and needs to be complied with.

Facility Description

SAF Holland is a heavy duty truck suspension manufacturer. SAF Holland employs approximately 230 employees at its Muskegon facility and runs two (2) shifts per day, six (6) days per week.

Compliance Evaluation

Much of the facility is dedicated to a variety of plasma and punch cutting operations, welding and sanding operations, other metal working process, and product assembly. SAF Holland has approximately 78 welding stations available for use; the welding operations are exempt from Rule 201 permitting under Rule 285 (i). Other metal forming operations including pressing, stamping, spinning, extruding, cutting, sanding, and grinding are exempt under Rule 285 (I)(i) and Rule 285 (I)(vi). These processes are exhausted into one of the baghouses located at the facility. The baghouses appeared to be functioning properly at the time of the inspection.

SAF Holland also has one un-permitted manual spray booth that uses water based paint. A conventional spray gun is used for the coating operations at this booth. KD explained that High Volume Low Pressure (HVLP) guns may be preferred by some companies for coating parts, as the transfer efficiency is typically higher. The booth had a properly installed fabric filter that is changed on an as needed basis, based on the pressure drop across the filter. Mr. Norton provided staff with records showing the filter changes and pressure drop readings. Mr. Norton also provided staff with appropriate monthly paint records including the hours painted per day and lbs. of paint used. Please note that page two (2) on the records is for the paint booth, and page one (1) is for the paint line (see below for evaluation of the paint line). Per Mr. Norton, the Titan paint is used in the booth, while the Valspar paint is used in the dip line. The highest month for paint usage was March 2015, where 1149 lbs. or 112.9 gallons of paint was used. This is below the allowable 200 gallons per Rule 287(c).

The one permit held by SAF Holland is for the paint dip-line that is equipped with a wash system and drying oven. The line consists of several tanks of various solutions including tap and RO water rinse tanks, a pickled acid tank, a rust inhibitor tank, and a bonding agent tank before it gets coated. The parts that receive the rust inhibitor are not coated. After the parts get dipped into the paint, they drip dry to reclaim any excess paint, which is then pumped back into the paint dip tank for re-use. All other waste appeared to be stored in appropriate containers. After the parts complete the dip-line process they proceed onto the oven. The parts are in the oven at 150 °F for 30 minutes. The stack specifications for the ovens were not verified during the inspection; however, there did not appear to be any changes. This line only uses one type of paint, the Valspar paint, but does mix the paint with solvent prior to application. SAF Holland requested, and obtained approval, for use of the manufacturer's data for VOC content. The MSDS for the paint and the required records are attached to this report for further details. All records appear to be properly kept.

The dip-line has a VOC limit of 2000 lbs./month and 10 tons/ year. The records indicate January 2015 having the highest VOC emissions in the past 12 months at 1,728.07 lbs. This is less than the permitted 2000 lbs./month. The 12-month rolling VOC emissions are 7.49 tons; this is also below the permitted limit. Complete details of the monthly records are attached.

SAF Holland has seven (7) parts cleaners. These cleaners are exempt under Rule 281 (h).

There are also three (3) identical boilers located in the boiler room of the main plant, and one (1) dissimilar boiler in the executive wing of the plant. All of boilers are natural gas only boilers and are inspected annually. The boiler in the executive wing is 1,020,000 BTUH capacity. The other three boilers have capacities of 390,000 BTUH. These boilers are exempt under Rule 282 (b)(i), and are not subject to 40 CFR Part 60, Subpart Dc.

Compliance Determination

Based on the observations made at the time of the inspection and the review of the available records, SAF Holland appears to be in compliance with PTI No. 06-02 and all applicable Air Quality Rules and Regulations.

NAME Kaitlyn Daine DATE 9.4.15 SUPERVISOR PAB