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

B771122841

FACILITY: SHERWIN-WILLIAMS COMPANY		SRN / ID: B7711
LOCATION: 636 East 40th Street, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Steve Eckert, EHS Manager		ACTIVITY DATE: 09/11/2013
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

An unannounced inspection was conducted of the facility. Steve was available to lead the facility tour and retrieve records as needed. He was presented with a copy of the "Environmental Inspections" brochure.

There are currently 4 production lines, a mixing area, and the tank farm at the plant. They currently operate can filling lines numbered 1, 6, 9, and 10. The plant is permitted under ROP #B7711-2011.

Line #4 is no longer in existence. Line 4 continues to be listed in the flexible groups as a placeholder in case they need to fill any liquid containers from a spigot.

Source-Wide

This table limits the HAPS to less than 9/22 tons. Records are being properly kept and show that they are in compliance. Calendar year 2012 emission of total HAPS were 9.6 tons per year. This is from a combination of both mixing and filling operations.

EU-TANKS-STORAGE

The company has 28 outdoor solvent storage tanks, with only 27 in service. These tanks are outfitted with conservation vents. The maintenance department is making sure they are set at the proper psi required in the permit. They are keeping records of liquid loaded into the tanks and the monthly inventory of the tanks, and the emission calculations. The 2012 throughput was 4.4 million gallons, less than the permitted 9.3 million gallons.

Aerosol Can filling Lines

There are 4 lines in the plant that all have similar configurations. Each line has stations to fill liquid, place then crimp & seal the valve assembly, propellant gas injection, cleaning (if needed), testing, and labeling. Each line has a photo-eye can counter installed. The plant fills various products including water based products and solvent based products. These may be cleaners, coatings, or other products. All of the cans, regardless of product, are pressurized with a propellant, usually some variation of propane or isobutane. Each line is also a subset of the larger flexible group for all the lines combined.

EU-LINE-01-AERO

This emission group defines the emission factor, limits the annual VOC, and limits the amount of cans that are allowed to be filled on the line. The records show that the cans processed in calendar year 2012 was about 27.2 million, less than the limit of 30 million. There are now two liquid filling stations on this line, but only one can be used at a time. There have not been any changes since last inspection. The gashouse for this line was last tested in 2008.

EU-LINE-06-AERO

There are no material throughput or emission limits specific to this line, and there is no stand-alone table for the line. The records show that the cans processed in calendar year 2012 was about 31.6 million. This line fills primarily water based products. The line is unchanged from last inspection.

EU-LINE-09-AERO

This emission group defines the emission factor, limits the annual VOC, and limits the amount of cans that are allowed to be filled on the line. The records show that the cans processed in calendar year 2012 was about 25.7 million, less than the limit of 33.5 million. There have not been any changes since last inspection. The gashouse for this line was last tested in 2008.

EU-LINE-10-AERO

This emission group defines the emission factor, limits the annual VOC, and limits the amount of cans that are allowed to be filled on the line. The records show that the cans processed in calendar year 2012 was about 28.0 million, less than the limit of 60 million. The line is unchanged from last inspection.

FG-MIX-FILL-CHRG

This flexible group includes hourly and annual VOC, methanol, & DME emission limits. It also limits the hourly and annual VOC emissions from aerosol change-outs. The total plant-wide material (gallons filled) for the 4 aerosol lines and Line 4 liquid, and all the mixing tanks is also limited.

Line 4, if used, is for liquid fill only does not have the capability for adding propellant.

The company is keeping proper records to show the gallons throughput, the propellant usage, emissions calculations, number of change-outs, and the change-outs emissions.

They filled about 7.8 million gallons of material in 2012, less than the allowed 40.1 million.

The cans filled on each line are counted. Each line has an emission factor for the amount of propellant (VOC) emitted per can. The total emission from all lines was 85.4 tons for 2012 vs. the permit limit of 160.6 tons. The emission due to propellant change-outs was 28.4 tons vs. a permit limit of 28.4 tons.

The Dimethyl Ether emissions are being tracked as required. They emitted only 43 lbs in 2012, vs. a permit limit of 48.5 tpy.

The Methanol emissions are being tracked as required. They emitted about 1.7 ton in 2012, vs. a permit limit of 9 tpy.

The access hatch to the roof was jammed, so we were not able to get up to look at stack heights. There appears to be some disagreement in the names and dimensions for some of the aerosol lines stacks within the ROP and compared to MAERS. This issue is being looked into and if need be, corrections will be made.

FG-RULE-290

The Marsh printers are located on each line to print the cardboard cartons. The ink jet (video jet) printers are located on each line to print identifying (coding) information on the bottom of each can. They are keeping the proper records showing that they are in compliance with the emission limits in order to be exempt. Total printing emissions are about 0.5 tpy.

They also operate manual acetone cleaning stations on Lines 1, 9 and 10. If a can gets paint or other product on the outside of the can, an inspector will pull the can to clean it off before putting it back onto the line. This is essentially a metal sink (<10 ft² surface area) filled with solvent in which cans can be immersed. This sinks are hooded and ventilated outdoors. The lids are closed when not in use. These units are exempt from the need for a permit since the emissions are less than 1000 lbs per month from each. These emissions are not reported in MAERS since they are not considered VOC's.

FG40-CFRPART59

This follows the federal rules for consumer goods. The required, and-up-to date records are kept at the Cleveland headquarters office, so staff was not able to review them at the plant. The full spreadsheet of the 2009 product data has been labeled as confidential and will be held in a secure AQD file area.

FG-PART63SUBPARTCCCCCC

This is the NESHAPS for the "Paint and Allied Products Manufacturing for Area Sources".

The compliance date for this regulation is December 3, 2012. AQD has received the initial notification on 5/25/2010. The Notice of Compliance Status report was received on 5/17/2013.

Boilers & Furnaces

We looked at the two gas-fired boilers are located in a room toward the rear of the building. Each has a nameplate rating of 4.18 million btu/hr. These units are exempt from the ROP but are listed in the Staff Report.

There are 7 gas-fired furnaces listed in MAERS that are located on the roof. These units are exempt from the ROP but are listed in the Staff Report. These units range from very small up to the largest rated at 6.5 million btu/hr.

NAME Dale Tinton

DATE 10/1/2013

SUPERVISOR MD 10/01/2013