

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

M371625614

FACILITY: C L RIECKHOFF CO		SRN / ID: M3716
LOCATION: 26265 NORTHLINE, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Timothy Smith, Treasurer		ACTIVITY DATE: 06/19/2014
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Targeted inspection, FY 2014		
RESOLVED COMPLAINTS:		

Date of Inspection: June 19, 2014

Date of Report: August 13, 2014

Inspected by: Jonathan Lamb, DEQ/Air Quality Division

Personnel Present: Timothy Smith, Treasurer

Contact Phone: (734) 946-8220 ext. 129

Contact Email: t.smith@rieckhoff.com

FACILITY BACKGROUND:

C.L. Rieckhoff Company, Inc. performs sheet metal fabrication of conveyor beds for material and packaging handlers (ie, USPS, UPS, FedEx, etc.). The company also handles architectural panels, though these parts are not fabricated or painted on-site. The facility started operations here in 1977 and is located in a light industrial/residential area. The company used to operate in two separate buildings on the property, but the second building was torn down and the main building was expanded in 2000. Currently, the facility is operating one shift, 7 a.m. to 3:30 p.m., Monday through Friday, and has around 60 employees.

COMPLAINT/COMPLIANCE HISTORY:

The facility was found to be in compliance at the time of the last site inspection on January 26, 2011. There have not been any complaints since the last inspection and there are no outstanding consent orders or LOVs.

PROCESS DESCRIPTION AND EQUIPMENT:

Flat stock sheet metal and angles are formed through cutting, bending, and welding into the components which make up a conveyor system. Cutting is done using plasma cutters. Fabricated parts are then coated using hand sprayers in open paint booths. Coated parts are then allowed to air dry before shipping out. All coatings are solvent-based. The facility also uses a clean-up solvent (xylol).

The permit was issued for two separate paint lines, one in each building. However, when the second building was torn down, the second paint line was removed and not re-installed when the primary building expanded. Therefore, there is only one paint line which consists of three "booths" (Paint Line 1).

The two plasma cutters are exempt via R.285(l)(vi)(C).

PROCESS CONTROLS:

Particulate emissions from the paint booth are controlled with dry filters and exhausted through three stacks, which come out of the east side of the building but meet the height standards set by the permit.

Particulate emissions from the two plasma cutters are controlled by a fabric filter with pre-cleaner and exhausted through two stacks on the roof.

APPLICABLE RULES/ PERMIT CONDITIONS:

C.L. Reickhoff was issued Permit #381-97 on September 8, 1997, for two paint lines. The permit set limits for HAP emissions, making the facility an Opt-Out source. Records from January 2011 through June 2014 were reviewed to determine compliance.

Note: Emission calculations, material usage records, and MSDSs for all coatings and xylol can be found in the orange facility file.

Permit #381-97, Special Conditions:

13. In compliance. All correspondence is sent to DEQ-AQD as required.
14. In compliance. VOC emissions from Paint Line 1 did not exceed 14.0 pounds per hour or 9.0 tons per 12-month rolling time period. The highest 12-month rolling total during the period evaluated was 7.2 tons of VOCs emitted from July 2013 through June 2014. A rough calculation shows an average emission rate of 8.8 lb/hr during May 2013 (highest month of emissions with a total of 1,404 lbs/VOC), assuming operating 8 hours per day, Monday through Friday. Note: Based on the comments in the permit evaluation form, the VOC emission limit for Paint Line 1 includes VOC emissions for coatings only; VOCs from clean-up solvent is not included in this emission limit and has its own limit in Special Condition #16.
15. Not applicable. Paint Line 2 is no longer in operation.
16. In compliance. VOC emissions from the booth clean-up solvents did not exceed 2.65 tons per 12-month rolling time period. The highest 12-month rolling total during the period evaluated was 2.63 tons of VOCs were emitted from July 2011 through June 2012. The 12-month rolling VOC total at the time of inspection was 2.31 tons from July 2013 through June 2014.
17. In compliance. HAP emissions from coatings and clean-up solvent do not exceed 9.0 tons for any individual HAP or 22.5 tons aggregate HAPs per 12-month rolling time period. Highest 12-month rolling total HAP emissions from xylene, toluene, and ethyl benzene were 7.0 tons from July 2013 through June 2014. Highest 12-month rolling total emissions of the highest individual HAP (xylene) were 5.7 tons from from July 2013 through June 2014.
18. In compliance. VOC content of coatings do not exceed 3.5 pounds per gallon of coating (minus water) as applied. The two coatings used, F77VXL and B50WZ1, have a VOC content of 3.32 lb VOC/gal and 3.29 lb VOC/gal, respectively.
19. In compliance. No visible emissions were observed during the inspection.
20. Not determined. Stack testing has not been required.
21. In compliance. Dry filters were installed and maintained as required.
- 22 and 23. In compliance. Records are maintained as required.
24. In compliance. Spent filters and used coatings are collected and disposed of in a satisfactory manner.
25. In compliance. Stack dimensions meet permit requirements.
26. Not applicable. Paint Line 2 and associated stacks have been removed.
27. In compliance. MSDS and Technical Data Sheets detailing the VOC and HAP composition of each coating and cleaning solvent are kept as required.
28. In compliance. HVLP spray applicators are used, as required.

FINAL COMPLIANCE DETERMINATION:

C.L. Reickhoff Company, Inc. is in compliance with Opt-Out Permit #381-97 and all other applicable rules and regulations.

NAME



DATE

9-3-14

SUPERVISOR

W.M.