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

1087827773		
FACILITY: HAVILAND PRODUCTS CO		SRN / ID: N0878
LOCATION: 421 ANN ST NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Milo Fortier, Environmental, Health, Safety Manager		ACTIVITY DATE: 10/23/2014
STAFF: Jenifer Dixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this in	spection was to complete a scheduled inspection an	nd to determine the facility's compliance with all
applicable Air Quality Rules and F	legulations.	
RESOLVED COMPLAINTS:		

This was an unannounced inspection. An "Environmental Inspections" brochure was provided at the time of the inspection.

The purpose of this inspection was to complete a scheduled inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations.

JD arrived in the area of the facility at 11:00AM and left at 1:30PM. No objectionable odors or opacity were observed during the inspection time. Mr. Jeff Blair, East Building Plant Manager, Josh Mueller, Environmental Health and Safety Manager, and Mr. Milo Fortier, Facility Manger, all provided pertinent information regarding the facility and the operations contained therein at various points during the inspection.

Haviland Products (Haviland) receives and repackages acids, caustics, and phosphates, or puts them in solution and packages them. They take products from rail cars and tanker trucks, then distribute or store them in totes and several sizes of drums and containers. They also mix dry products with water or acids to create cleaning products. The operations are exempt from Rule 201 permitting under the Rule 290 exemption. Control equipment, primarily scrubbers, limits emissions to less than 500 pounds per month for each emission unit. The records submitted claim an efficiency of the scrubbers of between 90-99%. All of the control scrubbers are located on the roof of the building unless otherwise noted. These emission units will be further discussed below.

EAST BUILDING

This building consists of stainless mixing tanks, reactor and "poly" mixing tanks and a reactor. Scrubbers appeared to be operating properly since fugitive emissions were not noted.

This facility has an external tank farm associated with it. These tanks are used to store raw materials. A complete description of these tanks and the contents are attached to this report.

The following emission units are located in the East Building:

- Acid Room and Associated Scrubber The Acid Room has several tanks that are used for storage. Control is achieved by manually moving suction hose to fill area. There are six exhaust points that go to the control scrubber. The emissions from the emission unit, for the most recent 12 months, were less than 5.0 lbs per month.
- 2. Peroxide Area (no control) Peroxide, magnesium bisulfate and sodium bisulfate are

- packaged in this area. All emissions are exhausted to the in-plant environment. The emissions from the emission unit, for the most recent 12 months, were less than 15.0 lbs per month.
- 3. Manufacturing and Associated Scrubber This emission unit has 7 liquid blending tanks and one powder. The emission unit has both manufacturing and packaging of the materials. These processes vent to a scrubber. The emissions from the emission unit, for the most recent 12 months, were less than 10.0 lbs per month.
- 4. Tanks and Associated Chrome Scrubber The emissions from the emission unit, for the most recent 12 months, were less than 5.0 lbs per month.

CORNER BUILDING

There were no ongoing operations in the Corner Building at the time of the inspection. Employees were engaged in building improvements. This location was the site of one of the releases the facility has had in the past year. This release did result in a fire that damaged some equipment. This equipment is in the process of being replaced.

The facility packages bromine tabs and powders into various sized of containers. There are three production lines that are controlled by baghouses. These emission units are exempt from Rule 201 permitting requirements under Rule 290 (a)(iii) as they meet all three criteria in order to utilize this exemption.

The following emission units are located in the Corner Building:

- 1. Bromine packaging and Associated Baghouse
- 2. VFFS#1, VFFS#2 and Associated Baghouse

WEST BUILDING

The West Building has two packaging lines that vent to the in-plant environment – The Copper and Dupont Lines. These lines fill bottles with product that has been manufactured by Haviland. The products are manufactured on the Liquid Blending or Powder Blending Lines. Both of the lines use a scrubber for control of emissions. Scrubbers appeared to be operating properly since fugitive emissions were not noted.

This facility has an internal tank farm. Some of the tanks are just for storage of raw materials and others are used for blending. A complete description of these tanks and the contents are attached to this report.

The facility also had a release in this building within the last year. The release occurred in Blender #1. This blender is in the process of being replaced.

The following emission units are located in the West Building:

- Liquid Blending and Associated Scrubber All of the 10 blending tanks and the waste treatment tank are vented to the scrubber. A complete description of these tanks and the contents are attached to this report. The emissions from the emission unit, for the most recent 12 months, were less than 5.0 lbs per month.
- 2. Powder Line and Associated Scrubber There are three powder blenders associated with this emission unit. The scrubber for this unit is physically located inside the

facility. This emission unit was not in operation at the time of the inspection. This emission unit is exempt under Rule 290(a)(iii).

Based on observations made at the time of the inspection and the subsequent review of the records supplied to JD by Mr. Mueller, Haviland appears to be in compliance with all applicable Air Quality Rules and Regulations.

NAME

DATE 11/17/14 SUPERVISOR_______