

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

N122832829

FACILITY: Evoqua Water Technologies		SRN / ID: N1228
LOCATION: 2155 112th St, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Jim Van Roo , Facility Manager of Engineered Products		ACTIVITY DATE: 12/21/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, unscheduled inspection and met with Wayne Laarman, as Jim VanRoo was out of the office. Mr. Laarman was presented with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed. I informed Mr. Laarman that this was a routine inspection, and a follow up to the Opt-out permit issued early in 2015 to ensure the permit was understood.

#### FACILITY DESCRIPTION

This facility manufactures liquid/solids filtration and separation equipment consisting of filter presses, sludge volume reducers, sludge dryers, centrifuges and portable mixers. Parts which are coated can range from a few pounds to several tons. The facility operates pursuant to the coating line General Permit to Install No. 212-10 and a HAPs Opt-out PTI No. 5-15. One coating operation consists of two dry filter spray booths, each with its own stack which are designated in the records as east and west booths. One spray booth is 40' x 25' and the second is 41' x 25'. The two booths are divided by a 10' roll-up door. This door can roll-up and out of the way to create one large 81' x 25' paint booth when necessary. At the time of the inspection the roll-up door was down, separating it into two booths. Neither booth was in use so visual inspection was possible. The filter bank consists of an outer layer and an inner layer. They utilize a pressure drop gauge to assist in the proper timing for filter changes.

The newer (2010 installation) large booth is also in use and has a similar filter set up. In addition, the new booth will shut down if the pressure drop is not within acceptable ranges. This booth is designated in the records as new booth.

We talked with Jeff Whipple, Paint Supervisor about the type of guns being used. He showed me the HVLP guns that they have been using. I told him about the requirement that it have no more than 10 psig of pressure at the tip to be considered HVLP. He indicated they would get some test caps to ensure they are at this value. I also discussed some of the new gun technology available, and that prior to switching they should ask for documentation on the transfer efficiency to ensure it is comparable.

The facility utilizes an internally vented sandblasting process to clean the metals prior to coating. This process is internally vented. A welding area is also in use, which is internally vented. A smog hog is present which aids in controlling welding fumes. An internally vented rotary table is present for shot blasting small parts.

We also observed the grinding room where employees use a hand held tool to deburr or buff the metals when necessary to make sure they are still utilizing the filter as required in a prior compliance inspection. A filter was present but had been raised to expose half of the opening. I stated that they are required to keep this covered.

The company also utilizes an underwater plasma spray process. This utilizes Nitrogen gas and electricity to cut steel in a water bath. This has no air emissions.

The above activities are exempt from permitting.

#### COMPLIANCE EVALUATION

General PTI No. 212-10

The format of the General PTI has changed since the last inspection, and an updated version was provided.

## FG-COATING

### EMISSION LIMITS

The facility utilizes a consultant to aid in recordkeeping. The general PTI limits emissions of VOC to 2000 lb/month per coating line and 10 tons per 12-month rolling time period per coating line. Reported emissions available through November 2015 indicate that the new booth had the highest VOC emissions at 187.94 pounds and a 12-month rolling total of 1.12 tons.

### MATERIAL LIMITS

NA

### PROCESS/OPERATIONAL RESTRICTIONS

AQD staff did not identify improperly stored purge/clean-up solvent.

### DESIGN/EQUIPMENT PARAMETERS

HVLP technology was in use at the time of the inspection, and particulate control filters were in place. No other control is in use at this facility.

### MONITORING/RECORDKEEPING

This facility appears to be keeping the appropriate monthly records. (see attached)

### REPORTING

NA

### STACK/VENT RESTRICTIONS

The facility has previously indicated the stack height meets the General PTI requirements.

### OTHER REQUIREMENTS

At this time, no new equipment has been installed.

## FG-SOURCE

The general PTI limits emissions of VOC at the facility to a total of 30 tons per 12-month rolling time period. Reported VOC emissions are 2.59 tons.

### Opt-out PTI No. 5-15

This permit is designated a facility HAPs Opt-out.

## FGFACILITY

### EMISSION LIMITS

This Opt-out limits each individual HAP to less than 9.0 tons per 12-month rolling time period and less than 22.5 for aggregate HAP per 12-month rolling time period. The highest reported HAP emissions are from xylene at 0.56 tons. The facility is just short of the 12-month period beginning at issuance of this permit on January 23, 2015. The 10-month rolling total is 0.80 tons. The facility was not maintaining individual HAP records with monthly totals. However, they did have a pollutant specific spreadsheet where I was able to see what the HAP information was. Therefore, just a minor upgrade to the recordkeeping is required to specifically list out HAP emissions.

### CONCLUSION

Evoqua Water Technologies was in compliance at the time of the inspection.

NAME *Spencer*

DATE 1-5-16

SUPERVISOR *PAB*