

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

N122853464

FACILITY: Evoqua Water Technologies		SRN / ID: N1228
LOCATION: 2155 112th St, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: John Holmes , EH&S Manager		ACTIVITY DATE: 04/09/2020
STAFF: Chris Robinson	COMPLIANCE STATUS: Unknown	SOURCE CLASS: SM OPT OUT
SUBJECT: FY '20 on-site inspection to determine the facility's compliance status with respect to applicable air quality rules and regulations including PTI No. 212-10 and 5-15.		
RESOLVED COMPLAINTS:		

On March 9, 2020, AQD Staff Chris Robinson (CR) conducted a scheduled unannounced inspection of Evoqua (SRN N1228) located at 2155 112<sup>th</sup> Street in Ottawa County, Holland, Michigan. CR met with John Holmes, Environmental Health and Safety Manager. The intent of the visit was relayed along with identification. Prior to entering the facility, the perimeter of the building was surveyed for odors and visible emissions. None were observed. Per discussions with Mr. Holmes there have been no changes to the process or equipment since the last inspection.

#### **Facility Description**

Evoqua manufactures water treatment systems for liquid/solid filtration and separation purposes primarily for municipalities, industrial water users and recreational facilities. This equipment consists of filter presses, sludge volume reducers, sludge dryers, centrifuges and portable mixers.

#### **Compliance Evaluation**

The facility operates pursuant to the coating line General Permit to Install No. 212-10 and 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 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. Parts which are coated can range from a few pounds to several tons. At the time of the inspection the roll-up door was down, separating it into two booths. Neither booth was in use during this inspection so visible inspection of the filters 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 filters used in the newer (2010 installation) large booth are similar but the new booth will shut down if the pressure drop is not within acceptable ranges.

The facility utilizes an internally vented sandblasting process to clean the metals prior to coating. This process is internally vented and appears to be exempt from Rule 201 permitting requirements per Rule 285(2)(l)(vi)(B). A welding area is also in use, which is internally vented and appears to be exempt from Rule 201 permitting requirements per Rule 285(2)(i). A smog hog is present which aids in controlling welding fumes. An internally vented rotary table is present for shot blasting small parts and appears to be exempt from Rule 201 permitting requirements per Rule 285(2)(l)(vi)(B).

The company also utilizes a plasma cutter for cutting steel. This process uses Nitrogen gas and electricity to cut steel in a water bath. This appears exempt from Rule 201 permitting requirements per Rule 285(2)(l)(vi)(B). Emissions, if any, are released to the in-plant environment.

#### **General PTI No. 212-10**

This is a General PTI for coating operations. As require the facility is subject to the most recent version which has changed slightly since the last inspection. A new copy was provided, and the compliance evaluation discussed below is based on the most recent version.

This PTI limits VOC emissions from the spray booths (FG-COATING) to 2000 pounds per month and 10 tons per year. Based on records provided by the facility for the time period of May 2019 through April 2020 total VOCs emitted was 8.57 tons which is less than the 10-ton limit. The maximum calculated monthly VOCs were 1,905.1 pounds (June 2019) which is 95 percent of the 2000-pound limit. Although the facility did not exceed the permit limit, this was brought to their attention.

Per observations and discussions, the facility is capturing all purge/clean-up solvents and waste coatings as required in FGCOATING Special Condition (SC) III.1. Waste material is containerized in drums and grounded.

The containers are eventually hauled off by Safety Kleen. Based on discussions with Mr. Holmes the facility is using HVLP spray guns as required in FG-COATING SC IV.1. However, there are no indications on the guns that they are HVLP and discussions with painting staff indicated that the pressure being used may be over 10 psig, which is the limit for HVLP. However, he was unsure and would follow up and get test caps if needed. Per phone conversation on June 26, 2020 the facility had reached out to the supplier of the spray guns and confirmed that that they were HVLP. CR conducted a quick internet search which confirmed HVLP status. Dry filters were installed and appeared to be maintained properly as required in FG-COATINGS SC IV.2. Requirements specified in FG-COATINGS SC IV.3, VI.1-2 & VI.5-7 apply to facilities that use either thermal or catalytic oxidizer. Evoqua does not use either, therefore these conditions do not currently apply to this facility.

The following records are being maintained as required per FG-COATING SC VI.2.

- Purchase orders and invoices for all coatings, reducers, and purge/clean-up solvents.
- VOC content of each coating, reducer and purge/clean-up solvent used.
- Gallons of each coating, reducer and purge/clean-up solvent used.
- Monthly and annual (12-month rolling) VOC emission calculations.
- Listing from the manufacturer for the chemical composition of each coating, including the weight percent of each component used. Per discussions with Mr. Holmes this is being done through Safety Data sheets.

Evoqua is also subject to a source-wide VOC limit of 30 tons per year per FG-SOURCE SC I.1. Based on the records provided by the facility as required by FG-SOURCE SC VI.1 VOC emissions for the time period of May 2019 through April 2020 was 8.57 tons, well under the 30 ton per year limit.

**PTI No. 5-15**

This PTI is the facility's Title V HAP opt-out permit limiting facility-wide aggregate HAPs to less than 22.5 tons per year and each individual HAP to less than 9.0 tons per year. FGFACILITY SC V.1 requires the facility to determine HAP content by using Manufacturers formulation data, which based on discussions with Mr. Holmes, is being done through Safety Data Sheets and they are using the higher end of the range noted. CR informed Mr. Holmes that going forward they will need to use Manufacturer's formulation data. FGFACILITY SC VI.2 requires the facility to maintain the following monthly records which were provided and are attached.

- Amount of each HAP containing material used and reclaimed.
- HAP content of each HAP containing material used.
- Monthly and annual (rolling 12-month) emission calculations for individual and aggregate HAPs.

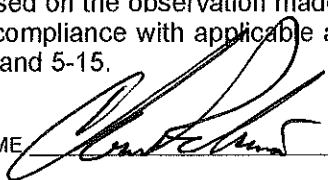
Monthly and 12-month rolling records were provided by the facility. Based on these records the total HAPs calculated for May 2019 through April 2020 was 1.13 tons with xylene being the highest at 0.54 tons. The facility's HAP emissions appear to be well below the limit specified in this PTI.

**MAERS**

The facility has been copying emissions and throughputs since 2017 instead of using actual annual data and they have not been providing supporting documentation as required when using Non-MAERS emission factors. After requesting several times, the facility provided calculations on 5/14/2020 which confirmed that they have not been submitting actual data. However, based on this data the facility has over reported emissions for 2019. Due to the circumstances going on at that time causing the difficulty obtaining calculations and the timing of everything CR uploaded the calculations, with facility approval, and accepted the 2019 submitted. The facility has ben informed that actual data must be used going forward and supporting documentation must be provided.

**Compliance Determination**

Based on the observation made during the inspection and a review of the facility's records Evoqua appears to be in compliance with applicable air quality rules and regulations including the requirements identified in PTIs 212-10 and 5-15.

NAME 

DATE 6/26/2020

SUPERVISOR 