

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

N323744135

FACILITY: HONEYWELL INTERNATIONAL, INC		SRN / ID: N3237
LOCATION: 375 N. LAKE ST., BOYNE CITY		DISTRICT: Cadillac
CITY: BOYNE CITY		COUNTY: CHARLEVOIX
CONTACT: Diane Fiel, Lean Expert		ACTIVITY DATE: 04/12/2018
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Compliance Inspection PTI 1378-91, 40 CFR Subpart N, HHHHHH, and WWWWWWW.		
RESOLVED COMPLAINTS:		

I conducted an inspection of this source to determine compliance with PTI 1378-91 and the Air Pollution Control Rules as well as 40 CFR 63 Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The Honeywell Boyne City facility manufactures sensors, indicators, and actuators for the aerospace industry. I met with Ms. Diane Fiel, (Health, Safety, Environment for Honeywell) who accompanied me on the inspection, answered questions and provided records.

In the past, Honeywell had six different permits covering (2) spray booths, degreasing, welding, misc. solvent, ink, and paint use, soldering and brazing, and chrome plating. All of these permits, with the exception of 1378-91 for the chrome plating process, were voided in 1999 and 2000. In 2007 the facility was removed from MAERS per a 6/21/07 letter from AQD stating that all processes (including plating) are exempt. The exemption cited for plating was R285(r) which does not appear to apply to chrome plating (the exemption covers surface treatment, pickling, acid dipping, cleaning, etching, electro polishing, electrolytic stripping or electrolytic plating). PTI 1378-91 was not voided at that time and is still active.

Production at this source is based at series of bench top workstations that make up a "cell" that produces one or more specific products. There are several different product cells throughout the plant but the workstations in each cell contain similar production processes including soldering, brazing, welding, cleaning (solvent use), adhesive application and painting (one main centralized paint booth and smaller volume painting at the work station level). Each work station is equipped with a flexible duct to exhaust fumes from any soldering or paint and adhesive application. These workstation processes appear to meet the requirements of the various Part 2 rule exemptions.

Compliance with Rule 287 is demonstrated by daily records of paint used in the plant. At the time of the inspection the records were maintained and indicate usage rates are below 200 gallons per month 64.19 gallons total in 2017. Solvent usage is included in the records and the company has a procedure in place limiting all paint and solvent purchases to less than 200 gallons per month.

Honeywell also has a machine shop that produces components of the parts that are assembled at the work stations. The machine shop includes several CNC machines as well as other automated and manual machining processes. Each machine was equipped with an individual dust collection system that vents inside the plant. Each of these processes appear to meet the Part 2 Rule exemptions in Rule 285(l).

Permit records indicate the plating operation was installed in 1956. A 1992 submittal from the company indicates that hexavalent chrome emissions were determined to be in excess of allowable limits and modifications were undertaken which were included in PTI 1378-91. These modifications included covering the surface of the tank with evaporation balls and limiting hours of operation to 40 hours per week, as well as shutting down an existing chrome plating operation in an adjacent building (the "Annex"). The permit includes stack dimensions of 21-inch maximum diameter and 38-foot minimum height. The permit file contains a letter form AQD stating that the PTI stack condition has been revised to a minimum height of 23 ft above ground.

My observation of the building prior to the inspection confirmed there were no stacks near 38 feet high and unlikely that any were 23 feet high. There were no visible emissions, aside from one vent emitting water vapor, and no odors. The plating stack was not visible from outside the plant, which is a one-story building. Maintenance staff at the facility stated the plating tank stack is an approximately 2' square duct on the blower motor that rises about 3 - 4 feet above the roof.

Plating takes place in a separate room in the plant that contains all the plating and rinse tanks. The plating tanks were equipped with evaporation balls and covers that were closed at the time of the inspection. Plating operations do not exceed 40 hours per week based on records that were provided

(attached). Daily hours of operation are typically 2 hrs. or less. The different plating operations in use are Passivation, Chemical Chrome, Chemical Tin, Chemical Copper, and Chrome Anodizing.

During an internal company audit Honeywell determined that the plating operation is subject to Subpart N (as well as 40 CRF 63 Subparts HHHHHH(paint stripping and misc. surface coating) and WWWWWW(area source standards for plating and polishing Operations) and that emissions from the anodizing tank exceeded the specified levels. As a result, they began using a fume suppressant in the anodizing tank and began submitting the NESHAP initial notification and notice of compliance forms and on February 4, 2016.

Fumetrol 21 fume suppressant has been used in the anodizing tank since 2016 (SDS attached). Fumetrol is an alternative to PFOS suppressants. There is no record of Honeywell having used fume suppressants prior to 2016. Evaporation balls have been in use since 1992. The attached Subpart N inspection checklist was completed based on the information available at the time of the inspection. PFOS suppressants are currently not in use. It is likely the evaporation balls were used in place of suppressants since their use began in 1992. It is unknown if PFOS fume suppressants were used prior to 1992.

The Annex building currently houses an engineering department, warehouse, and subcontracted gear manufacturing. No plating operations take place in the Annex according to Ms. Fiel.

The notification of compliance status for Subpart N indicates that the source is in compliance with the subpart.

The initial notification report for Subpart 6H indicates that the source is in compliance with the subpart.

The initial notification report for Subpart 6W indicates that the source is in compliance with the subpart.

As indicated above, Honeywell had been removed from MAERS in 2007. Since this source is an Area Source subject to a MACT standard, Honeywell should be included in MAERS as a Category III facility.

At this time it appears that the facility is in compliance with PTI 1378-91 with the possible exception of the stack/vent parameters. Additionally, it appears each of the applicable exemptions are appropriately applied.

I have requested that Honeywell verify that the Plating stack complies with the permit or takes corrective action to attain compliance.

NAME 

DATE 4-17-18

SUPERVISOR 