

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N340859436

FACILITY: HILITE INTERNATIONAL		SRN / ID: N3408
LOCATION: 2001 PEACH ST, WHITEHALL		DISTRICT: Grand Rapids
CITY: WHITEHALL		COUNTY: MUSKEGON
CONTACT: Evert VanderBerg ,		ACTIVITY DATE: 07/21/2021
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Air quality compliance inspection.		
RESOLVED COMPLAINTS:		

Introduction

On July 21, 2021 State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an air quality inspection of the Hilite International facility located at 2001 Peach St. in Whitehall, Michigan to assess compliance with air quality regulations. This inspection was an un-announced, on-site inspection.

This facility is a manufacturer of engine valves used in motor vehicles through use of various machining, oil bath, and testing equipment. It is an unpermitted facility as all production equipment appears to be exempt from air permitting requirements.

Inspection

Upon arrival at the facility, SE observed no odors or visible emissions coming from the facility. After entering the facility, SE was met by Environmental Health & Safety Lead Evert VanderBerg (EV). A discussion was had regarding the purpose of the inspection, at which time EV provided SE with documentation of all equipment at the facility with notes of applicable air permitting exemptions. A copy of this analysis is included with this report. After this discussion, an inspection was conducted to verify the accuracy of provided documentation.

The facility has two boilers on site. Both boilers have a maximum heat input of 133,000 BTU/h. These boilers are exempt from air permitting under Rule 282(2)(b)(i). These boilers are exempt from New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Dc as the heat inputs are below 10 mmBtu. These boilers are exempt from National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 60 Subpart JJJJJ as they are natural gas fired.

The facility has one air hood system that ventilates isopropyl alcohol vapors directly to the facility exterior. This unit is exempt from air permitting requirements by Rule 290(2)(a)(i) as records that were reviewed on-site demonstrate average monthly use of isopropyl alcohol to be approximately 5 gallons with approximately 3.5 gallons recovered. Mass balance calculations demonstrate that this equates to approximately 9 lbs. of isopropyl alcohol emitted monthly, which is well below the uncontrolled emission limit of 1000 lbs. per month allowed by the exemption.

The facility has multiple air-cooling units installed for plant employee comfort. These units are exempt from air permitting requirements by Rule 280(2)(b) as comfort air conditioning units.

The facility has one tray washing unit that is exempt from air permitting requirements by Rule 281 (2)(e) as no VOCs are used and no oil is burned.

The facility has one tank that stores only cutting fluid that is exempt from air permitting requirements by Rule 284(2)(c).

This facility has one emergency generator that is exempt from air permitting requirements by Rule 282(2)(a) as the maximum heat input is 1.3 mmBtu/hr. This generator is exempt from NSPS 40 CFR Part 60 Subpart JJJJ as it was installed in 2013 (after January 1, 2009) and is used only as an emergency unit. The generator is subject to NESHAP 40 CFR Part 63 Subpart ZZZZ which stipulates compliance with NSPS 40 CFR Part 60 Subpart JJJJ. There are not additional requirements for the unit under this NSPS.

The facility has multiple electric ovens used for pre-heating and epoxy setting on manufactured components. These ovens are exempt from air permitting requirements by Rule 282(2)(a)(i).

The facility uses small numbers of handheld aerosol cans for various processes within the facility. These cans are punctured, drained, and recycled after use. The use and disposal of these cans is exempt from air permitting requirements by Rule 285(2)(hh).

The facility has multiple injection molding machines used for manufacturing processes. These units all are exempt from air permitting requirements by Rule 286(2)(b)

Conclusion

At the conclusion of the inspection, the facility appeared to be compliant with all applicable air quality regulations. All equipment on site appeared to meet air permitting exemption requirements.

NAME Scott Evans

DATE 8/20/2021

SUPERVISOR HH