

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

N370543674

FACILITY: Dawson Manufacturing		SRN / ID: N3705
LOCATION: 1042 North Crystal Avenue, BENTON HARBOR		DISTRICT: Kalamazoo
CITY: BENTON HARBOR		COUNTY: BERRIEN
CONTACT: Mike Burk , General Manager		ACTIVITY DATE: 03/14/2018
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On March 14, 2018 AQD Staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Dawson Manufacturing facility located in Benton Harbor, Berrien County. According to a district file review, the facility has one air permit (PTI No. 103-93) currently issued to them and it was originally for 24 injection mold presses. 21 of the presses were single stage and the other 3 were multi-staged. The facility had expanded operations back in 2000 and when doing so added additional presses that were being operated under the AQD permit exemption Rule 290. PTI No. 103-93 didn't have much in terms of special conditions regarding operations. The facility only has to track monthly production and keep records of product VOC contents. The purpose of staff's inspection was to determine compliance with the permit and with the Rule 290 permit exemption recordkeeping requirements. Staff departed for the facility after inspecting another facility nearby and having lunch.

Staff arrived at the facility at approximately 1:20 p.m. Prior to entering the facility staff looked to see if any visible emissions were present but none were observed. Staff proceeded into the reception area. Staff introduced them self to the receptionist and stated the purpose of the visit. Staff was told that they probably needed to meet with Spencer Campbell (HR Manager) and/or Mike Burk (General Manager). She contacted them both and Spencer came out to greet staff first. Staff introduced them self, stated the purpose of the visit, and gave Spencer a business card. Mike then came out a few minutes later and staff introduced them self to him also and stated the purpose of the visit. Spencer and Mike then led staff to a conference room. Once in the conference room, Spencer and Mike then left to get Mike Moore (Production Control Manager) who has been keeping the air records now. They came back a few minutes later and staff introduced them self to Mike. The following is a summary of staff's discussions with them and a summary of staff's inspection.

Dawson manufactures rubber anti-dampening (for shock) devices for Ford and Tier 1 suppliers. These rubber products can include bushings, body cushions, cradle mounts, strut mounts, engine mounts, etc. They said that Ford entails about 60% of their business for their F-150 and F-250 pick-up trucks and the other 40% is for some Tier 1 suppliers (Hitachi, TRW, Teneco). The facility currently employs approximately 105 people and they are operating 3 shifts Monday thru Friday. They said that business has been okay and they are currently operating at about 45%-50% capacity (~ 15 of 30 presses being operated at any given time). Staff then asked about the presses and if any changes had been made. They replied that nothing has been added or removed and they still have 30 presses. Staff mentioned that during the last inspection they were told that they had a total of 27 presses. Mike Burk mentioned that he's been there since 2006 and nothing has been added. He said that they have nineteen (350SX) 400 ton presses and eleven 800 tons presses all manufactured by Rutil out of Italy. Staff then asked if they still had the 3 multi-stage presses and Mike said that they do not and that they are all single stage. He said the 3 multi-stage presses were sold years

ago before his time. Staff then asked if they still had the media blaster for cleaning molds and they said that they did. Staff then reviewed records prior to taking a tour of the facility.

The facility is calculating emissions using the AP-42 emission factors for the Manufacture of Rubber Products (Platen Press Curing) that were developed by the Rubber Manufacturing Association. These factors have been allowed to be used and they have been in the proposed stage for years, but the EPA still has yet to finalize them. After staff's last inspection it was determined that the rubber compounds used by Dawson most closely resemble Compound #1 (Dawson's Butyl Rubber Formulation) and Compound #3 (Dawson's Natural Rubber Formulation). Staff was told they still use the same basic formulations and the rubber they receive is still processed off-site. Rule 290 records reviewed by staff appear to indicate that they're in compliance with the monthly emission limits. They are also keeping track of monthly rubber production and they have the SDS for compound formulations as required by PTI No. 103-93. Staff then went on a tour of the facility with Mike Burk and Spencer. Mike Moore excused him self and staff thanked him for his time.

Out in the plant staff observed some of the press operations and Mike and Spencer showed staff some of the rubber parts they were currently manufacturing. Staff also observed the rubber that is used prior to it getting heated up in the mold injector presses. As mentioned in staff's previous inspection, it reminded them of a bicycle inner tube. Staff noted that none of the presses exhaust outside but the building has roof exhaust fans that ultimately pull any emissions out to the ambient air. Staff did not note any odors, opacity issues, or anything of concern related to the press operations. Staff also observed the media/shot blast machine. This is located just outside the maintenance area and it is equipped with a dust collector that exhausts inside. This unit uses a product called Plastic Blast Media and the process appears to be exempt per Rule 285(l)(vi).

Staff then proceeded with Mike and Spencer back up into the office area. Staff mentioned to them that everything appears to be in order and thanked them for their time. Staff departed the facility at approximately 2:20 p.m.

INSPECTION SUMMARY: The facility appears to be in Compliance with PTI 103-93 and the AQD Rule 290 permit exemption at the present time.

NAME Matt Dah

DATE 3-16-18

SUPERVISOR YMA 3/16/18