

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

N374825585

FACILITY: Belding Tank Technologies, Inc.		SRN / ID: N3748
LOCATION: 200 N Gooding St., BELDING		DISTRICT: Grand Rapids
CITY: BELDING		COUNTY: IONIA
CONTACT: Paul Crystler, Purchase Manager		ACTIVITY DATE: 06/20/2014
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced inspection		
RESOLVED COMPLAINTS:		

## FACILITY DESCRIPTION

The facility manufactures fiberglass reinforced plastic tanks. Since the last compliance inspection the facility has constructed the second tank assembly building (EUTANKASSEMBLY2).

## REGULATORY ANALYSIS

The facility is operating under ROP No. MI-ROP-N3748-2012, which was issued on October 8, 2012. As part of the renewal the conditions of PTI No. 89-08A were rolled into the ROP. PTI No. 89-08A addressed a second tank assembly area (EUTANKASSEMBLY2).

The facility is subject to Subpart WWW – Reinforced Plastics Composites Production NESHAP.

## COMPLIANCE EVALUATION

No opacity or odors were noted outside of the production/resin storage buildings.

At the facility, staff met with Paul Crystler, Purchasing Manager, who is in charge of the facilities environmental affairs.

Mr. Crystler stated that to his knowledge the facility is not out of compliance in regards to applicable air quality rules and regulations.

Below is a summary of the facility's compliance with the ROP requirements.

### Source-wide requirements - Table B

I.1. VOC limit of 89.9 tons per year based on a 12-month rolling average.

Comment: Review of the facility records show the 12-month rolling total VOC emissions ending in May 2014 to be 37.27 tons (combined styrene and MMA)

Status: Compliant

I.2. Styrene limit of 57.6 pounds per hour based on a calendar day facility-wide and calendar day hours of operation calculation

Comment: For the records reviewed, the facility was in compliance with the hourly emission limit.

Status: Compliant

**II.1. Styrene content of chop/hoop winding not to exceed 50%**

**Comment:** Review of facility records showed compliance with this limit. The facility does not use any resins with a styrene content that exceeds 50%.

**Status:** Compliant

**II.2. & 3. Styrene content of vinyl ester lamination resins not to exceed 35%, except for the use of up to 160,000 pounds per year of 45% styrene content. –**

**Comment:** Primary vinyl ester has a styrene content of 33%. The corrosion resin has a styrene content of 45%. The facility only uses a limited amount of the corrosion resin with 45% styrene, well less than the allowed limit.

**Status:** Compliant

**II.4. Styrene content of resin for wet filament winding not to exceed 50% -**

**Comment:** Review of facility records showed compliance with this limit. The facility does not use any resins with styrene content greater than 48%.

**Status:** Compliant

**II.5. Styrene content of isophthalic resins not to exceed 50%.**

**Comment:** Review of facility records showed compliance with this limit. The facility does not use any resins with styrene content greater than 48%.

**Status:** Compliant

**II.6. Styrene content of gelcoats not to exceed 37%**

**Comment:** Review of facility records showed compliance with this limit. The facility does not use any non-tooling gelcoat with styrene content greater than 32.9%.

**Status:** Compliant

**II.7. Styrene content of tooling gelcoat not to exceed 42%**

**Comment:** Review of facility records showed compliance with this limit. The facility does not use any tooling gelcoats with styrene content greater than 41.8%.

**Status:** Compliant

**III.1. Operate mold rooms with exhaust filters.**

**Comment:** All booths inspected had exhaust filters in place.

**Status:** Compliant

**IV.1. Use of non-atomizing applicator guns.**

**Comment:** Mr. Crystler stated that the facility uses all non-atomized guns.

**Status: Compliant**

**IV.2. Filament chop/hoop shall be done using dry winding in combination with non-atomizing guns with chop.**

**Status: Compliant**

#### **EUMOLDROOM1**

**I.1. VOC limit of 438 pounds per calendar day**

**Comment: Records reviewed showed compliance with daily limit.**

**Status: Compliant**

**I.2. VOC limit of 15.3 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.3. Styrene limit of 17.8 pounds per hour**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 15.1 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**VIII.1. Stack height of 60 feet, 30 inch maximum diameter**

**Comment: Visual observation of stack showed that it appeared to meet the required dimensions.**

**Status: Compliant**

#### **EUMOLDROOM2**

**I.1. VOC limit of 937 pounds per calendar day**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.2. VOC limit of 29.7 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.3. Styrene limit of 38.0 pounds per hour**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 29.2 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**VIII.1. Stack height of 60 feet, 36 inch maximum diameter**

**Comment: Visual observation of stack showed that it appeared to meet the required dimensions.**

**Status: Compliant**

#### **EUMR3&4NORTHMOLD**

**I.1. VOC limit of 391 pounds per calendar day**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.2. VOC limit of 6.6 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.3. Styrene limit of 15.8 pounds per hour**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 6.5 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

#### **EUMR3&4MIDMOLD**

**I.1. VOC limit of 391 pounds per calendar day**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.2. VOC limit of 8.9 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.3. Styrene limit of 15.8 pounds per hour**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 8.8 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

#### **EUMR3&4SOUTHMOLD**

**I.1. VOC limit of 391 pounds per calendar day**

**Status: Compliant**

**I.2. VOC limit of 14.0 tons per year**

**Status: Compliant**

**I.3. Styrene limit of 15.8 pounds per**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 13.8 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

#### **EUMOLDROOM5**

**I.1. VOC limit of 391 pounds per calendar day**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.2. VOC limit of 14.0 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.3. Styrene limit of 15.8 pounds per hour**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 6.5 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

### **EUCLEANUP**

**I.1. Acetone emission limit of 55 tons per year.**

**Comment: Records show the facility emitted 25.61 tons for the 12-month period ending in May 2014.**

**Status: Complaint**

### **EUTANKASSEMBLY**

**I.1. VOC limit of 62.2 pounds per calendar day**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.2. VOC limit of 3.6 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.3. Styrene limit of 2.6 pounds per hour**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 3.6 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**II.1. Styrene content in resin not to exceed 35%**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

### **EUTANKASSEMBLY2**

**I.1. VOC limit of 62.2 pounds per calendar day**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.2. VOC limit of 3.6 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.3. Styrene limit of 2.6 pounds per hour**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**I.4. Styrene limit of 3.6 tons per year**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

**II.1. Styrene content in resin not to exceed 35%**

**Comment: Records reviewed showed compliance with limit.**

**Status: Compliant**

### **FGMR3&4**

**I.B.1. Stack height of 60 feet, 36 inch maximum diameter**

**Comment: Visual observation of stack showed that it appeared to meet the required dimensions.**

**Status: Compliant**

**I.B.2. Stack height of 60 feet, 36 inch maximum diameter**

**Comment: Visual observation of stack showed that it appeared to meet the required dimensions.**

**Status: Compliant**

**FGCOMPOSITESMACT****Subpart WWW – Reinforced Plastics Composites Production NESHAP**

Subpart WWW had a compliance date of April 21, 2006. The facility has opted to show compliance with the standard via Option C. Option C allows for demonstration of compliance with a weighted average emission limit for all open molding operations. Option C compliance is based on a 12-month rolling average. The facility is using the software created by ACMA for recordkeeping and compliance demonstration with the NESHAP.

**Comment:** Review of the facility's records shows compliance with the MACT weighted average emission limit for the 12-month period ending in May 2014. The facility was at 84.6 percent of the limit at that time.

**Status:** Compliant

**Work Practice Standards –** The facility is subject to five work practice standards under the NESHAP (63.5805, Table 4). The facility became subject to these standards on April 21, 2006.

For each cleaning operation, the permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. (40 CFR 63.5805, Table 4)

**Comment:** The facility stated that they do not use any HAP containing solvents.

**Status:** Compliant

For each HAP-containing materials storage operation, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. (40 CFR 63.5805, Table 4)

**Comment:** The facility has two 5500 bulk tanks that are divided for iso and vinyl resins. Each side has a vent. The facility has appropriate covers on the bulk tanks as observed during the inspection.

**Status:** Compliant

For each mixing operation, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. (40 CFR 63.5805, Table 4)

**Comment:** The facility has two "day tanks" located adjacent to the southern bulk tank. Both day tanks have mixers in them. During the inspection, both day tanks had appropriate lids with allowable gaps around the mixer shafts.

**Status:** Compliant



For each mixing operation, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement. (40 CFR 63.5805, Table 4)

Status: Compliant


#### Misc

The facility uses a two part foam, Spraytite 158 Isocyanate and Spraytite 158 resin on some of the tanks. The manufacture has previously supplied a letter indicating no VOC emissions or extremely small amount of emissions.

Comments: The facility is maintaining records of material usage per a previous request.

#### Summary

Based on this inspection the facility is in compliance with applicable air quality rules and regulations.

NAME 

DATE 6/27/14

SUPERVISOR 

