

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

N390735479

FACILITY: VIDON PLASTICS INC		SRN / ID: N3907
LOCATION: 3171 JOHN CONLEY DR, LAPEER		DISTRICT: Lansing
CITY: LAPEER		COUNTY: LAPEER
CONTACT: Ralph Dias , Plant Manager		ACTIVITY DATE: 07/11/2016
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection of facility last inspected by AQD in 2011, and review of SDS sheet for ink used at the site, which contains no HAPs.		
RESOLVED COMPLAINTS:		

On 7/11/2016, the DEQ, AQD conducted an unannounced, scheduled inspection of Vidon Plastics Inc., which was last inspected by AQD in 2011.

Facility description:

This facility manufactures plastic extrusions. This includes products like automotive trim, as well as custom work, like sign trim for individual businesses.

Environmental contact:

As of summer 2016: Ralph Dias, Plant Manager (retiring around autumn 2016); 810-667-0634

As of autumn 2016: Rob Gilkef, Plant Manager; 810-667-0634; rgilkef@vidonplastics.com

Emission units:

Emission unit description	Applicable exemption	Operating status, at time of inspection
16 existing plastic extrusion lines	Rule 286(a)	Compliance
3 new plastic extrusion lines	Rule 286(a)	Compliance
Natural gas fired annealing oven, 800,000 Btu/hr	Rule 282	Not operating, at time of inspection
8 ink jet printing processes	Rule 287(c)	Compliance
Plastic assembly/fabrication area	Rule 285(I)(vi)(B)	Compliance

Regulatory overview:

This facility is classified as a minor source, not having the Potential to Emit (PTE) to be a major source for criteria pollutants. Criteria pollutants are those for which a National Ambient Air Quality Standard (NAAQS) exists. These include carbon monoxide (CO), nitrogen oxide (NOx), sulfur dioxide (SO₂), volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM-10) and particulate matter smaller than 2.5 microns (PM_{2.5}). A major source for criteria pollutants has the potential to emit 100 tons per year (TPY) of one or more criteria pollutants.

The facility has so far been considered a minor source for Hazardous pollutants (HAPs). A major HAPs source has the PTE to emit 10 TPY or more of a single HAP, or 25 TPY or more of aggregate HAPs, if the facility were to theoretically operate 24 hours per days, 7 days per week, every day of the year, at maximum production rates. The ink jet coating lines, which are exempt from needing a permit to install under Rule 287(c), were of interest to AQD, because they might make Vidon Plastic a major source for HAPs. It is my understanding that there are 8 ink coating lines, and a general rule of thumb is that a single coating line may have a PTE of up to 6 TPY HAPs and 6 TPY VOCs. PTE for the ink jet printers is discussed later on, in this report.

Their plastic extrusion processes, annealing oven, and ink jet printing process are exempt from the Rule 201 requirement to obtain a Permit to Install (PTI). This facility once had PTI No. 576-93, for 15 plastic extrusion machines, the annealing oven, and an adhesive process. That PTI was voided in 1999, as the adhesive line was removed from the plant, and the other processes are considered exempt.

the final product gradually shrinking over time. The oven is used rarely, we were informed, and is used mostly for storage space, now.

Note: Ken Terry's 9/19/2006 inspection report refers to this being exempt under Rule 282, but does not say which subpart. The most likely choice appears to me to be 282(a), for heat treating.

8 ink jet printers; Rule 287(c):

We were informed that the ink coating lines are used for marking the date on parts. It is my understanding that there are 8 printers now, but only 4 or 5 are used, at any one time.

I explained that with a number of ink jet printers, they might have the PTE to be a major source for HAPs, even though they would not have the PTE to be a major source for VOCs. A Rule 287(c) exempt coating line is considered to have a PTE of 6 TPY VOC, and potentially of 6 TPY HAPs. I asked for Safety Data Sheets (SDS), so that I could do a calculation of PTE for HAPs, if any, in the ink. Mr. Dias provided a copy of their SDS sheet for the ink (attached for reference).

At a later date, I reviewed the SDS sheet for the ink. The ink contains Butanone at 60-100% and Tetrabutylammonium hexafluorophosphate at 1-5%, but neither of these is a listed HAP from EPA's current list of HAPs. Therefore, the PTE for HAPs for all the ink coating lines is 0 TPY HAPs. This facility does not appear to have the PTE to be a major source of HAPs, based on their ink jet printers.

Vidon Plastics also does not appear to have the PTE to be a major source for VOCs, based on the printers. The PTE for VOCs, using a worst case scenario of 6 TPY VOC for each of the Rule 287(c) exempt ink jet printers, would be 48 TPY. This is below the 100 TPY VOC major source threshold.

I was advised that all the ink jet printers combined use less than 200 gallons per year of ink. This would put each coating line well under the Rule 287(c) exemption threshold of 200 gallons per year from needing an air use permit. Rule 287(c) exempts the following:

- (c) A surface coating line if all of the following conditions are met:
 - (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
 - (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
 - (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

Fabrication area; Rule 285(l)(vi)(B):

They also do some minor assembly and fabrication work. This can include die cutting, cutting, and creating notches, holes, and angles. These processes appear to be exempt under Rule 285(l)(vi)(B), as any emissions are released only into the general, in-plant environment. I did not observe any visible emissions.

Tool room; Rule 285(l)(vi)(A) and/or (B):

They have a tool room in the plant, with tools such as a vertical milling machine. These tools can be considered exempt under either Rule 285(l)(vi)(A), for operating on a non-production basis, or Rule 285(l)(vi)(B), for exhausting into the general, in-plant atmosphere. The tools are used for repairs and for making needed parts, I was informed.

We left the site at 3:07 PM. There were no visible emissions nor any odors detectable outside the plant.

Conclusion:

No instances of noncompliance were found, and the facility was clean and neat. Based on AQD review of an SDS sheet provided for the ink used at the site, which contains no listed HAPs, the PTE for the ink