DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

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FACILITY: Clarion Technologies, Inc.		SRN / ID: N3985	
LOCATION: 501 CEDER ST, GREENVILLE		DISTRICT: Grand Rapids	
CITY: GREENVILLE		COUNTY: MONTCALM	
CONTACT: Randy Baker, Operations Manager		ACTIVITY DATE: 11/16/2017	
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR	
SUBJECT: Scheduled, unannounced inspection.			
RESOLVED COMPLAINTS:	•		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 9:32 am on November 16, 2017 to complete a scheduled, unannounced inspection. The weather conditions were partly cloudy, winds to the southeast at approximately 15mph, and middle 30's°F.

Facility Description

Clarion Technologies, Inc. (CT) is manufacturer of plastic parts for various areas including consumer products, automotive industries and home appliances. The site does not operate with a permit; however, instead utilizes exemptions for all on site processes.

Compliance Evaluation

Prior to entering the facility, offsite odor and visible emission observations were completed. No visible emissions were observed, and a slight paint/plastic smell was noted. Upon entering the facility, AQD staff AS met Mr. Bob Heath, Maintenance Manager, who provided a tour of the facility, provided information regarding site operations, and provided requested documents. Mr. Randy Baker, Operations Manager, who was unavailable during the site inspection, will remain as the MACES contact for CT.

The following observations were made throughout the walk through of the facility.

- Thirty-seven plastic injection molding machines ranging from 400 1,450 tonnages in size were observed in operation, and make up the bulk of the onsite processes. One 2,000-ton plastic injection molding machine was also observed; though it was offline and not in use. Three 80,000 lb. storage silos containing resin are located along the exterior portions of the facility. Additionally, large numbers of dryers and equipment used to transfer dried material to the injection molding machines were observed. Bad plastic parts are collected and taken offsite by Padnos. All resin equipment observed on site appears to be exempt per Rule 286(2)(b).
- Two cold cleaners were observed during the site inspection. One cold cleaner that uses mineral spirits was in the general maintenance area and the second cold cleaner was located adjacent to the pad printing area. Both cold cleaners have an air/vapor interface area of less than 10 square feet. The cold cleaner observed in the maintenance area was open at the time of the inspection and AQD staff AS advised Mr. Heath on keeping it closed when not in use. An operating procedures label was observed on the cold cleaner located in the pad printing area; however, one was not observed on the maintenance area cold cleaner. AQD staff AS provided Mr. Heath several cold cleaner procedure labels. Both cold cleaners appear to be exempt per Rule 281(2)(h).
- Four pad printing units were observed on site. When questioned on monthly usages for each pad printing unit, CT staff stated that they use a quart for all four a month. Purchase records since November 2016 were provided for all four pad printing units and Mr. Heath stated that materials purchased are used. Based on the records provided, the four pad printers monthly total usages combined are well within the 200 gallons a month limit. The four pad printing units appear to be exempt per Rule 287(2)(c).
- Miscellaneous maintenance equipment was observed in the maintenance area including a drill press. Equipment observed appears to be exempt per Rule 285(2)(I)(vi)(A).
- CT utilizes a mold cleaning solution (Tool Genie) for various operations. The cleaning solution is applied via hand towels. When asked how much they utilize in a given year, CT staff stated approximately 110

gallons (two 55-gallon containers). A Material Safety Data Sheet (MSDS) for the cleaning solution was requested and provided. The cleaning solution appears to be exempt per Rule 285(2)(r)(iv).

- An assembly cell for a washer part for Whirlpool was observed; however, CT staff stated the assembly cell was offline at the time of the inspection. A second assembly cell for a whirlpool product was also observed where rubber cement is used to seal a gasket. An MSDS of the rubber cement was requested and provided. In a phone conversation with Mr. Randy Baker, it was stated that 2.5 gallons of the rubber cement are used a month. Based on this it appears that the assembly cell is exempt per Rule 287(2)(c).
- A 300-gallon oil tank containing Mobil oil was observed on site. The tank appears to be exempt per Rule 284(2)(c).
- A natural gas furnace used to heat the building was observed. The size of the furnace is 750,000 Btu and appears to be exempt per Rule 282(2)(b)(i).
- Two pumps used for cooling the injection mold machines and chillers were observed during the site inspection. The material used in the pumps is a mixture of water and a biocide.
- A glass shelf machine was observed during the inspection. During operation of this piece of equipment, glue is cured via UV rays. It a phone conversation with Mr. Randy Baker, it was stated that for this machine less than half a liter of glue is used a month. Based on this, it appears that this unit is exempt per Rule 287(2)(c).

Conclusion

A final discussion was held with AQD staff and Mr. Heath. Based on the review of the records provided and the facility walk through, CT is following all applicable air pollution rules and regulations at this time.

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