

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

N538351442

FACILITY: Mersen USA		SRN / ID: N5383
LOCATION: 712 INDUSTRIAL PARK DR, GREENVILLE		DISTRICT: Grand Rapids
CITY: GREENVILLE		COUNTY: MONTCALM
CONTACT: Jason LaFramboise , Quality/Safety Manager		ACTIVITY DATE: 11/20/2019
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 Mersen USA (Mersen) facility located in Greenville, MI at 1:00pm on November 20, 2019 to complete a schedule unannounced inspection. The weather conditions at the time of the inspection were cloudy skies, temperatures in the low 40's °F and winds from the southwest at 5-10mph. Prior to entering the facility offsite odors and emission observations were completed. No odors were noted, and no emissions were observed prior to and during the inspection.

Facility Description

Mersen is a graphite machining company. All finished products are produced from synthetic graphite which is shipped onsite before going through the various onsite processes. The facility is a true minor source for all criteria pollutants. The facility is in operation with Permit to Install (PTI) No. 190-04B.

Compliance Evaluation

Upon entering the site, AQD staff AS met with Mr. Jason LaFramboise, Quality/Safety Manager, who provided a tour of the facility, answered site specific questions and provided requested records following the inspection.

PTI No. 190-04B

This permit is for the four following emission units that are grouped together under an FGFACILITY.

EU-United Air, EU-Dust Hog, EU-SFC-48-3, and EU-Donaldson – Graphite process equipment such as Mills, Lathes, grinders, sanders, band saws, etc., used to shape graphite materials. Emissions from the graphite machining operations are ducted to a baghouse which vents internally within a building.

During the site inspection, numerous process operations and equipment that are used to create various graphite products were observed. Equipment observed is vented to one of the four dust collection systems mentioned above.

EU-SFC-48-3 – This dust collection system was in operation at the time of the inspection. A magnehelic gauge was noted to be in place. A reading of 2.0" of water column (w.c.) was observed. Emissions from this dust collection system are vented internally. A vent was noted in the room of the dust collection system but was concluded to be a heat vent. Particulate captured by the dust collection system is stored in white supersack bags. The dust collection system uses cartridge filter bags and after speaking with Mersen staff, appears to change them on an as needed basis. Based on the observations made, this unit appeared to be operating satisfactorily.

EU-Donaldson – This dust collection system was in operation at the time of the inspection. A magnehelic gauge was noted to be in place. A reading of 0.8" of w.c. was observed. While observing the system, it was noted that an exhaust vent for the dust collection system was into a small room with an external vent. Per PTI No. 190-04B, FGFACILITY, Special Condition (SC) 1.3, exhaust gases shall not be discharged to the ambient air at any time. Though the exhaust vent to the dust collection system is in the area of the external vent it is technically not being vented directly into the ambient air. The external vent in question was also identified in the PTI No. 190-04B application process as a vent for fugitive emissions. The remaining vent for the dust collection system was observed venting internally. Particulate captured by the dust collection system is stored in white supersack bags. The dust collection system uses cartridge filter bags and after speaking with Mersen staff, appears to change them on an as needed basis. Based on the observations made, this unit appeared to be operating satisfactorily.

EU-United Air – This dust collection system was in operation at the time of the inspection. A magnehelic gauge was noted to be in place. A reading of 2.2" of w.c. was observed. For this system ductwork was observed going from the inside to the rooftop of the building before being vented back inside. While discussing the ductwork along the rooftop of the facility, it was determined that staff do not routinely access the rooftop. Potential options such as installing a magnehelic gauge for the ductwork when leaving/entering the building or including regular inspections of the rooftop, were discussed in order to identify leaks in the ductwork along the rooftop. Particulate captured by the dust collection system is stored in white supersack bags. The dust collection system uses cartridge filter bags and after speaking with Mersen staff, appears to change them on an as needed basis. Based on the observations made, this unit appeared to be operating satisfactorily.

EU-Dust Hog – This dust collection system was in operation at the time of the inspection. A magnehelic gauge was noted to be in place. A reading of 2.4" of w.c. was observed. Emissions from this dust collection system are vented internally. Particulate captured by the dust collection system is stored in white supersack bags. The dust collection system uses cartridge filter bags and after speaking with Mersen staff, appears to change them on an as needed basis. Based on the observations made, this unit appeared to be operating satisfactorily.

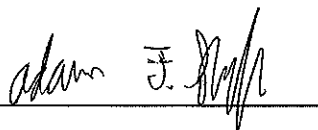
Additional Observations

- Two parts washers were observed during the site inspection. The parts washers are maintained by Crystal Flash. Both parts washers were closed at the time of the inspection and appear to be exempt from Rule 201 permitting under Rule 281(2)(h).
- One emergency generator was observed during the site inspection that is used to power the front office during a power outage. The emergency generator is a Kohler Model # 60REZGB, 60 kw sized generator that runs on natural gas. The emergency generator was installed on October 24, 2012. The emergency generator is subject to the New Source Performance Standards (NSPS) Subpart JJJJ for Stationary Spark Ignition Internal Combustion Engines. Mersen staff stated an hourly meter was installed on the emergency generator that read 176.8 hours of operation. The emergency generator is only used for emergency power outages with the last outage occurring on November 16, 2019. Maintenance for the emergency generator is completed by G&D Electric. Additionally, the generator does an automatic startup test once every Monday at 9:00am for approximately 20 minutes in length. Moving forward, it will be discussed with Mersen staff on properly recording the hours of operation to demonstrate compliance. Maintenance invoices were requested and provided. A certificate of conformity was requested and provided by Mersen staff. Based on the observations made and the records provided, Emergency Generator Model # 60REZGB appears to be in compliance with NSPS Subpart JJJJ rules and regulations. The emergency generator is potentially subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ – Reciprocating Internal Combustion Engines, however, the AQD does not have delegation from the EPA to enforce this NESHAP, and an applicability determination was not completed during this inspection. The emergency generator appears to be exempt from Rule 201 permitting under Rule 282(2)(b)(i).
- A welding area was noted during the inspection with all equipment observed appearing to be exempt from Rule 201 permitting under Rule 285(2)(i).

Conclusion

Based on the facility walkthrough, observations made, and records received, Mersen appears to be in compliance with PTI No. 190-04B.

NAME



DATE

12/19/19

SUPERVISOR

