

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

N559928943

FACILITY: LYONS INDUSTRIES		SRN / ID: N5599
LOCATION: 30000 M-62 WEST, DOWAGIAC		DISTRICT: Kalamazoo
CITY: DOWAGIAC		COUNTY: CASS
CONTACT: Nikki Bisnett		ACTIVITY DATE: 03/26/2015
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. The inspection brochure was handed out. Nikki Bisnett is the contact person. A moderate styrene odor was detected in the parking lot on the south.

Records were reviewed for Feb. 2015 back through 2014. The facility is doing all required calculations. They are in compliance with the emission limits. The facility is in compliance with the MACT WWWW emission limits. The current VOC 12-month rolling average is around 62 tons. They have switched resins from Reichhold PolyLite 33315-05 to AOC resin. The MSDS for the new resin lists the styrene content at 30%. However, the certified product analysis sheets that come with the delivery of the resin list the styrene content at about 32%. It was recommended to Ms. Bisnett to contact the supplier to check on this. Currently the facility is using the 32% styrene content in calculations. Vinyl toluene is listed as 5-10%. This is a VOC but not an organic HAP. It is a monomer that polymerizes. An emission factor for vinyl toluene was found in Permit 93-03A by permit staff. The equation to use is: Pounds of resin used (per month) x weight % of vinyl toluene in resin (10% or 0.1) x emission factor (0.07). Taking December, 2014, as an example: 230,140 pounds of resin x 0.1 x 0.07 = 1,610.98 pounds of vinyl toluene emitted as a VOC in Dec., 2014. This should be entered on the recordkeeping sheets and tracked with the VOC recordkeeping.

Usage of resin and catalyst is obtained from purchase orders and bill of materials. Resin is stored in an outside bulk tank. It is then pumped to 6 mixing tanks inside the building. Filler and titanium is added. Two of the mix tanks had open covers. These should be kept closed when materials are not being added. Two robots have replaced manual sprayers. These use chop-type guns.

Plastic molds are made by a thermoforming process. These are tub or shower-related products. These are then placed on carts and enter the spraying area. Manual and two robotic guns are used for resin and fiberglass application. Booth filters are changed daily. They appeared to be in good condition. The parts move to a curing area. After curing the parts go to a room where they are trimmed. Grinding and sawing operations take place here. The room and machines are ducted to an outside dust collector.

No visible emissions were seen at the dust collector. Fines from the dust collector are collected in a dumpster. This appeared to be well sealed. The bags are checked twice/year. The pressure is checked once/week. The upper limit is 2.5. The dust collector is checked daily for operation. The duct collector exhaust is emitted back inside the building.

The facility appears to be in compliance.

NAME

Dennis Dunlap

DATE

3/31/15

SUPERVISOR

MB 4/1/2015