

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

N649625433

FACILITY: BARRY CONTROLS		SRN / ID: N6496
LOCATION: 1300 S COUNTY FARM DR, ITHACA		DISTRICT: Lansing
CITY: ITHACA		COUNTY: GRATIOT
CONTACT: Andy Frisbie, HSE Coordinator		ACTIVITY DATE: 05/15/2014
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled PCE inspection		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Mike Clingan, Quality Engineer (michael.clingan@hutchinsonna.com)
Andy Frisbie, HSE Coordinator (andy.frisbie@hutchinsonna.com)

Purpose: Conduct an unannounced, scheduled, partial compliance evaluation (PCE) inspection by determining compliance with Barry Controls' Permit No. 57-05A, including verification that Barry Controls stayed within the permit's emission limits to remain an opt-out source and not enter into Title V status. This inspection was done as part of a full compliance evaluation (FCE).

Facility Background/Regulatory Overview: Barry Controls makes suspension wraps for armored humvees, and heat-resistant suspension mounts for heavy trucks, Harley Davidson, the Cummins diesel, Peterbilt, etc.

Barry Controls is an opt-out facility. VOCs and PM are limited to various rates, depending on the process, and there is a facility-wide HAP restriction.

Inspection: At approximately 2:00 p.m. on May 15, 2014 I met with Andy Frisbie, the new HSE Coordinator, and Mike Clingan. I gave A. Frisbie a DEQ "Environmental Inspections: Rights and Responsibilities" brochure, my business card, and a May 2012 Permit to Install Exemptions Handbook. None of the equipment was being run during the inspection because Barry Controls was in the process of doing an inventory on their equipment.

Emission Unit ID	Emission Unit Description	Flexible Group
EU-RUBBERMOLDING	Rubber injection molding and compression presses, not to exceed 40 presses. Central ventilation with a fabric filter vents a minimum of 28 presses.	NA
EU-DESPATCH1 & 2	Post-cure of metal and rubber parts, post-cure of adhesive coated metal parts in electricity-heated oven. Each unit has its own exhaust stack	FG-DESPATCH
EU-ADHESIVEDIP1 & 2	Enclosed dual tank adhesive dip machines with overhead cure oven, controlled by RTO	FG-RTO
EU-MANUALBOOTH	Manual spray booth with dry filters, controlled by RTO	FG-RTO

EU-APM1 & 2	Automatic spray paint/adhesive machine/booth with dry filters and hot air dryer, controlled by RTO	FG-RTO
EU-PRODPLUS	Production machine that applies coating to tubes and washers with brush applicator. Parts are hot air dried in the machine after coating, controlled by RTO	FG-RTO

EU-RUBBERMOLDING

Barry Controls, according to M. Clingan, currently has 35-37 presses. The permit limits the number of presses to 40. Barry Controls is limited to 6,000,000 lb/year of rubber molded in the injection and compression molding presses. According to Barry Controls' emission 12-month rolling emission summary, from May 2013 – April 2014 1,424,823 lbs of rubber was molded in the presses.

M. Clingan said that Barry Controls has approximately 50 types of rubber that they mold and process. He provided me with an MSDS of the 2 types of rubber that are used the most: 1668 and 2739. Each MSDS contains the wt% of each component in the rubber. I recommended that in the future Barry Controls use the MSDS identification number for the rubbers being used, in addition to their standard notation of rubber #3 and rubber #11, as seen in the monthly emission summary.

Barry Controls has both the rolling 12-month totals spreadsheet for material processed and VOCs emitted, but also individual, detailed spreadsheets per month (see attached for March 2014 summary) in which is kept the type of rubber molded, the amount of each type of rubber processed through the presses, the VOC content for the types of rubber pressed, and the monthly VOC emissions. 100% of the VOC in the rubber is assumed to be released. The permit limits the amount of VOC that can be emitted per 12-month rolling time period to 3.1 tons. From May 2013 – April 2014, VOCs emitted was 0.43 tons. Barry Controls is in compliance with material and emission limits for this emission unit.

All particulate emissions from this process are vented to cartridge filters located outside of the building. There are 5 hoppers that collect the dust from the filters and 5 55-gallon drum containers to collect the particulate from the hopper for disposal. There are no suggested operating ranges for the pressure differential gauge, however, as required by permit, Barry Controls has kept daily records of the pressure drop on the fabric filters. See attached for daily pressure drop recordings. A. Frisbie said that Barry Controls identifies the particulate collection as "Fume Collection System" because not much particulate that makes it to the collection system.

Barry Controls is in compliance with all conditions associated with EU-RUBBERMOLDING.

FG-DESPATCH

Barry Controls is limited to 140,500 lb/year of rubber processed through the post-cure ovens. According to Barry Controls' emission 12-month rolling emission summary, from May 2013 – April 2014 31,510 lbs of rubber was processed. M. Clingan said that all rubbers processed through the presses also go through the post-cure ovens; therefore, all MSDS associated with the rubber used in the presses can also be used for FG-DESPATCH post-cure ovens.

Barry Controls has both the rolling 12-month totals spreadsheet for VOCs emitted, and individual, detailed spreadsheets per month (see attached for March 2014 summary) the amount of rubber processed through the post-cure ovens, the VOC content for the types of rubber pressed (a 5.5 wt% VOC emission factor is used, per permit recommendation), and the 12-month rolling monthly VOC emissions in tons/year. The permit limits the amount of VOC that can be emitted per 12-month rolling time period to 4.0 tons. From May 2013 – April 2014, VOCs emitted was 0.87 tons. Barry Controls is in compliance with material and emission limits for this emission unit.

Barry Controls is in compliance with all conditions associated with FG-DESPATCH.

FG-RTO

M. Clingan said that when cleaning out the lines to any of the pieces of equipment in this flexible group, the lines are flushed into a bucket and the waste is manually dumped into a hazardous waste container. M. Clingan explained that the manual spray booth fabric filters are

checked every week and that at the end of every shift the fabric filters are swept down and the particulate from this process is then swept up and disposed of. When the filters can no longer be reused (for both the automatic spray booths and manual spray booth), M. Clingan said that if the filter is wet is it allowed to dry, then the dry filter is disposed of in a dumpster.

I inspected the manual and automatic spray booth fabric filters, all 3 sets appeared to be installed and maintained appropriately.

M. Clingan confirmed that all spray booths are equipped with HVLP applicators.

The RTO, which controls all VOC emissions from the emission units in FG-RTO, was running at 1500°F during the time of the inspection (although there were no VOCs being sent to the control device during the inspection), and M. Clingan said the RTO is usually kept at 600°F in standby mode by burning natural gas. M. Clingan provided me with a continuous record of RTO temperatures from February 2012 through January 2013. He explained that the rest of the data was still stored on a disk and had not yet been incorporated into the continuous monitoring chart provided. All temperature data points remained at or above 1500°F. The permit requires a minimum temperature of 1400°F to ensure satisfactory operation. According to a previous inspection report, the RTO was stack tested in 2004 and results showed that the destruction efficiency of the RTO was 98.72%. The permit requires a combined capture and destruction efficiency of 85%.

M. Clingan provided me with the MSDS for the most-used adhesive and the most-used primer through FG-RTO. They contain the wt% of each VOC and component and the density of the material. M. Clingan said that none of the coatings used in FG-RTO are water-based.

The gallons of each coating, adhesive and solvent used, the VOC content of each, and the VOC mass emission calculations for FG-RTO are included in the spreadsheets that contain emission data for EU-RUBBERMOLDING and FG-DESPATCH. The 12-month rolling VOC emissions from May 2013 – April 2014 for FG-RTO was 4.8 tons (controlled). The permit limits VOC emissions to 30.0 tons/year.

Barry Controls is in compliance with all conditions associated with FG-RTO.

FGFACILITY

All HAPs emissions reported are based on control through the RTO. M. Clingan provided me with a HAPS emissions summary sheet for May 2013 – April 2014. The largest quantity of a single HAP generated was 2.3 tons and the combined total of all HAPs emitted was no more than 4 tons. The permit limits single HAPs to less than 9.0 tons/year and aggregate HAPs to less than 22.5 tons/year.

Barry Controls is in compliance with all conditions associated with FGFACILITY.

Compliance statement: Barry Controls is in compliance with all state and/or federal regulations at this time.

NAME M. Clingan

DATE 6-10-14

SUPERVISOR M. Clingan

