

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 ACTIVITY REPORT: Self Initiated Inspection

N682124320

FACILITY: Reliable Relamping Inc		SRN / ID: N6821
LOCATION: 6459 NASH HWY, SARANAC		DISTRICT: Grand Rapids
CITY: SARANAC		COUNTY: IONIA
CONTACT: Dan Schmidt, President		ACTIVITY DATE: 02/12/2014
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection		
RESOLVED COMPLAINTS:		

Unannounced inspection of Reliable Relamping.

Prior to entering the facility a survey showed no visible emissions or odors. The amount of snow and ice on the bulb crushing truck showed that it had not been *moved in quite a while*.

At the facility EG met with Dan Schmidt, President.

FACILITY DESCRIPTION

Reliable Relamping services lighting at large retail stores.

REGULATORY ANALYSIS

The facility holds one permit (373-00) for a portable bulb crusher that is mounted in a truck.

COMPLIANCE EVALUATION

The truck was on-site at the time of inspection, but was not in operation. Mr. Schmidt stated that all bulbs are brought back to the facility to be crushed instead of crushing them at the stores.

EU-LAMP CRUSHER

Emission unit includes the truck mounted lamp crusher controlled by a prefilter, HEPA filter and two carbon beds in series.

Emissions Limits

The emission unit has limits for mercury and particulate. The permit also requires no visible emissions from the emission unit. Compliance with the emission limits is demonstrated through proper operations of the control equipment and through monitoring/testing with a mercury vapor analyzer.

Status: Compliant

Production Limit/Records

The permit limits the number of lamps that can be processed to no more than 500,000 lamps per calendar month as a combined total for all sites. Compliance with the production limit is demonstrated through daily and monthly records of the number of lamps processed. Review of the facility records for 2013 demonstrated compliance with the production limit.

Status: Compliant

Process/Operational Limits

The permittee must handle, transport and dispose of all mercury contaminated wastes according to applicable regulations. The facility stated that due to the low mercury bulbs, they are no longer considered hazardous waste. The permittee is required to maintain the emission unit according the PM plan in Appendix A of the permit and to inspect the prefilter on a daily basis and the HEPA filter on a weekly basis. Review of the facility records showed that they are complying with the PM requirements.

Status: Compliant

Portable Equipment

The emission unit is only used at the facility site on Nash Highway, and is no longer operated as a portable unit.

Status: Compliant

Equipment Limits

The facility is required to maintain system seals, blowers, filters and carbon filters. Compliance with this condition is based upon the PM checks that the operator performs. The unit is required to be mounted in a properly label truck, which it is.

Status: Compliant

Monitoring

15. *Every two weeks, according to a method acceptable to the Air Quality Division, the permittee shall measure the mercury and mercury compounds concentration in the exhaust gas stream between the Primary Carbon Filter and the Secondary Carbon Filter, and after the Secondary Carbon Filter. If the mercury concentration is 0.01 mg/m³ or greater, the permittee shall remove the Primary (lead) Carbon Filter from service, and replace it with the Secondary (lag) Carbon Filter. The permittee shall then replace the Secondary Carbon Filter with a new one. If the mercury concentration after the Secondary Carbon Filter is also found to be 0.01 mg/m³ or greater, both carbon filters shall be replaced. (R 336.1205, R 336.1224, R 336.1225, R 336.1901, 40CFR 52.21 (c) and (d))*

Review of facility records showed that they were testing in accordance with the above condition. All sampling showed concentrations below 0.01 mg/m³.

Status: Compliant

Recordkeeping

16. *For EU-LAMP CRUSHER, the permittee shall keep the following production, operation, maintenance, and disposal records:*
- A. Daily and monthly records of the number of lamps processed.*
 - B. Records of the date, hours operated, and number of lamps processed at each site.*
 - C. Records of all filter inspections, cleanings, and replacements including the number of lamps processed between carbon filter replacement.*
 - D. Records of all mercury and mercury compound monitoring and the number of lamps processed between each measurement.*
 - E. Records of transport and disposal of all mercury contaminated wastes, including spent filters.*

All records shall be kept on file for a period of at least five years and shall be made available to the Air Quality Division upon request. (R 336.1201, R 336.1205, R 336.1225, R 336.1901, 40CFR 52.21 (c) and (d))

The facility provided records demonstrating compliance with the above conditions.

Status: Compliant

Stack Condition

- 17. *The exhaust gases from EU-LAMPCRUSHER shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 4 inches at an exit point not less than 13 feet above ground level. (R 336.1225, R 336.1901)*

Visual observation of stack showed that it appeared to meet requirements.

Status: Compliant

Based upon the information and observations made during this inspection, the facility appears to be in compliance with applicable air quality rule and regulations.

NAME  DATE 2/18/2014 SUPERVISOR 

