

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

N683025595

FACILITY: Rubber & Plastics Co		SRN / ID: N6830
LOCATION: 3961 Mill St, NORTH BRANCH		DISTRICT: Lansing
CITY: NORTH BRANCH		COUNTY: LAPEER
CONTACT: Larry Harding, President		ACTIVITY DATE: 06/19/2014
STAFF: Brian Culham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Determine if the source is operating or not.		
RESOLVED COMPLAINTS:		

Larry Harding – President orders@rubberandplastics.com

Rubber and Plastics was identified for a scheduled inspection because it is considered a synthetic minor source of Hazardous Air Pollutants (HAPS) and it had not been inspected in the last three years. Permit 205-00 is an Opt-out permit and limits facility wide HAP emissions below major source threshold. This inspection will result in a full compliance evaluation.

The facility reports to MAERs and pays a Category III fee for being subject to 40 CFR 63 Subpart T (degreasers). During the MAERs audit it was noted that the facility had reported zero for the throughput values of all emission units. It was suspected that the source may be closed.

Rubber and Plastics is located in the northwest quadrant of the small town of North Branch. Rubber and Plastics is a single small building situated on approximately 1/4 of a square block of property. The surrounding area is residential with some commercial, however it is my understanding that Rubber and Plastics has obtained a variance to operate as light industrial in this location. The plant has been operating at this site for approximately 40 years.

Rubber and Plastics coats metal parts with PVC plastic and natural rubber. The plant has several dipcoat lines for this purpose. Dryer ovens are used for curing. A trichloroethylene (TCE) vapor degreaser was once used to strip parts for re-processing. A batch cold degreaser subject to 40 CFR 63 Subpart T has taken the place of the vapor degreaser.

A Consent Order, No. 27-2003 was entered on September 29, 2003 to resolve allegations of violations. The violations included installation of processes without first obtaining an air use permit and noncompliance with Subpart T. Permit 205-00 was issued as part of the proceedings. A letter dated November 2003 indicated that the vapor degreaser was decommissioned in May of 2000 as part of the compliance plan. The vapor degreaser process was replaced with the occasional use of solvent cold cleaning in 5 gallon batch containers. The Consent Order was terminate on September 19, 2011.

Emission units at time of last plant entry and current operational status:

Emission Unit ID	Emission Unit Description	Stack ID	Permit	Current status
EUDRYER1	Natural rubber and Neoprene rubber washer and natural gas fired dryer oven for drying of leached neoprene and rubber parts.	SVDRYER1	No. 205-00	Not operating
EUDRYER2	Conveyorized natural gas fired curing oven for Neoprene parts.	SVDRYER2	No. 205-00	Not operating
EUDIPCOAT1	Batch dip coat process for preheating, PVC dip coating and curing in natural gas fired oven.	SVDIPCOAT3	No. 205-00	Not operating
EUDIPCOAT2	Batch dip coat process for wet Neoprene suspension, dip coating and curing in natural gas fired oven (EUDRYER2).	SVDRYER2	No. 205-00	Not operating
EUDIPCOAT3	Batch dip coat process for preheating, PVC dip coating and curing in natural gas fired oven.	SVDIPCOAT4	No. 205-00	Not operating
EUDIPCOAT4	Two conveyorized Clip coating lines for preheating, dip coating and curing of stamping parts. Electrically heated oven.	SVDIPCOAT5	No. 205-00	Not operating

EUCOLDCLEANER	Cold cleaner for part stripping consisting of three 5-gallon buckets containing 2.0 gallons Trichloroethylene (CAS # 79-01-6) in each bucket.	NA	No. 205-00	Not operating
EUDIPCOAT5	One conveyORIZED Clip coating line for preheating, PVC dip coating and baking of Clip parts. The preheat and curing oven is natural gas fired.	SVDIPCOAT7A, SVDIPCOAT7B, SVDIPCOAT7C, SVDIPCOAT7D	No. 205-00	Not operating
EUPRIMECOAT	A primer coating station with a general room exhaust.	SVPRIMECOAT8	No. 205-00	Not operating
EUDIPCOAT6	Three conveyORIZED Clip coating lines for preheating, PVC dip coating and baking of Clip parts. The preheat and curing oven is natural gas fired.	SVDIPCOAT9, SVDIPCOAT10, SVDIPCOAT11	No. 205-00	Not operating
EUCLEANUP	Any clean up and purge solvents used in the processes.	NA	No. 205-00	Not operating

On May 19, 2014, I was in the area and I drove to the Rubber and Plastics site at about 11:00 am. The structure was neat and the lawn recently mowed. There were no lights on in the building, nor were there any vehicles parked on the property indicating employees may be inside. The building was not open.

On May 18, 2014, I contacted Mr. Larry Harding, President, by phone to see if he would be at the North Branch site so that I could do an inspection. He informed me that the plant had been closed for over a year. There is no immediate plan to reopen the plant.

I discussed voiding the permit 205-00 with Larry Harding. I explained that doing so would relieve Rubber and Plastics of the MAERs emission reporting requirement, any Subpart T reporting requirements, and that the AQD could terminate the bill for Air Use fees. Mr. Harding stated that he is trying to sell the business as a whole and that voiding the permit may discourage potential buyers.

EUCOLDCLEANER, PTI No. 205-00

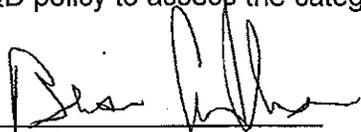
In most circumstances, Subpart T requires the submittal of annual reports for degreaser activities. I had not seen any record submittals from Rubber and Plastics and expressed my concern with Mr. Harding.

It is my understanding that after the November 2003 notification of the decommissioning of the vapor degreaser, only batch cold cleaning was left at Rubber and Plastics. According to Mr. Harding, the cold cleaner did not operate in 2013 and has not operated in several years. The batch cold cleaner traditionally uses trichloroethylene (TCE). In the 2013 MAERs data, throughput for TCE was reported as zero gallons.

Regardless of throughput, an annual report, if required, must be submitted for subpart T. I researched the subpart and learned that, because the remaining solvent cleaning is characterized as a "batch cold cleaner" and not a "batch vapor cleaner" the degreasing process is not subject to the annual reporting requirements contained in 40 CFR 63.468(f) or (g).

I contacted Dennis McGeen of the AQD ERA unit to determine if the fee is still required. He stated that it is AQD policy to assess the category III fee as long as the permit remains active.

NAME



DATE

6-23-2014

SUPERVISOR

