DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

B735270014

FACILITY: Seaver Industrial Finishing Co.		SRN / ID: B7352		
LOCATION: 1645 Marion St., GRAND HAVEN		DISTRICT: Grand Rapids		
CITY: GRAND HAVEN		COUNTY: OTTAWA		
CONTACT: Steve Dood , Maintenance		ACTIVITY DATE: 11/15/2023		
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR		
SUBJECT: FY '24 on-site inspection to determine the facility's compliance status with applicable air quality rules and regulations including				
PTI no. 70-05D.				
RESOLVED COMPLAINTS:				

On November 15, 2023, staff Chris Robinson (CR) and Dillon King (DK) from Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) conducted an inspection at Seaver Industrial Finishing Company (SRN B7352) located at 1645 Marion Street in Grand Haven Michigan. The purpose of this inspection was to determine this facility's compliance with applicable state and federal air quality rules and regulations including Permit to Install No. 70-05D.

Weather conditions were mostly cloudy approximately 56 deg F with winds coming out of the southwest at approximately 16mph (www.weatherunderground.com). AQD staff surveyed the perimeter of the facility, upon arrival, for odors and visible emissions. None were observed.

The facility contact Steve Dood was not available during the inspection However, Seaver staff Jennifer provided a walkthrough of the facility and CR followed up with Steve onsite on December 1, 2023, to review records. Identification was provided and staff were informed of the purpose of the inspection.

Facility Description

Seaver Industrial Finishing Company (Seaver) is a job shop that powder coats furniture, automotive and other miscellaneous metal parts. The facility no longer uses any type of wet coat application.

Compliance Evaluation

1) PTI No. 70-05D:

This PTI covers the burn-off oven used to clean racks used in the facility's powder coating line.

EUNEWBURNOFFOVEN

Emission Unit EUNEWBURNOFFOVEN was operating during the inspection and consists of a Pollution Control Products (PCP) brand natural gas fired only burn-off oven equipped with an afterburner for pollution control. Temperature displays for both the main chamber and afterburner, a circle chart data recorder, as well as automatic temperature controllers have been installed and appear to be maintained well. During the inspection the emission unit was operating with a main chamber temperature of 796 degrees Fahrenheit and an afterburner temperature of 1,588 degrees Fahrenheit. Per Steve, only the metal racks used on the powder coating line are cleaned in the burn off oven. Based on the manufacturer labels on the emission unit it is equipped with a flame safeguard and an interlock relay. Contrary to Special Condition (SC) IV.3 the interlock system only works to prevent the unit from overheating by engaging the water spray system, not by shutting down the main oven in response to an afterburner failure. If an afterburner failure is detected the unit will complete its cycle but not restart until the issue is addressed. This unit is operating as intended by PCP.

Temperature data is being recorded and was reviewed onsite. A circle chart is attached as an example. Based on this data, the afterburner temperature is being maintained at above 1,400 deg F when operating. Annual calibrations are being conducted as required with the most recent one being performed on March 21, 2023.

2) Rule 201 Permitting Exemptions:

The powder coating line consists of a 5-stage washer, natural gas fired drying oven, manual and automatic sprayers, a natural gas curing oven, and a cooling tunnel. Approximately 90% of the waste powder is captured and recycled. The remaining is captured by an internally vented baghouse which is equipped with a magnehelic gauge. The differential pressure was 0.00" w.c since neither the powder coat line nor baghouse were operating during the inspection. Although the magnehelic gauge is used to determine if there is an issue that needs attention, filter bags are typically changed based on hours of operation. The entire powder coating line appears to be exempt per Rule 287(2)(d). The facility utilizes a small portable welder and equipment for cutting, grinding, and sanding metal. This equipment is used for both maintenance purposes and for manufacturing and repairing part hangers used on the powder coating line. The welder appears to be exempt per Rule 285(2)(i) and the equipment used for cutting, grinding, and sanding metal appears to be exempt per Rule 285(2)(i) and the equipment used for cutting, grinding, and sanding metal appears to be exempt per Rule 285(2)(i)(vi)(B) for emissions that are only release to the in-plant environment. This includes a hood equipped with filters used for sand blasting.

3) MAERS:

The facility modified their PTI in 2021 to remove the equipment destroyed in a 2017 fire. With the removal of that equipment the facility was considered a minor source and no longer needed facility -wide restrictions. Therefore, FGFACILITY was removed from the PTI, and they were no longer required to report to MAERS.

Conclusion

Based on the observations and records review Seaver Industrial Finishing Company appears to be in compliance with applicable air quality rules and regulations including the requirements specified in PTI No 70-05D.

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