

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

N122429275

FACILITY: Monroe LLC		SRN / ID: N1224
LOCATION: 4707 40TH ST SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Kal Bird, Technical Manager		ACTIVITY DATE: 04/29/2015
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:00 P.M. on April 30, 2015, Air Quality Division staff Dave Morgan and Kaitlyn Devries conducted an unannounced scheduled inspection of Monroe LLC located at 4707 40th Street in Grand Rapids. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations as well as Permit to Install No. 558-96A. Accompanying AQD staff on the inspection was Kal Bird, Technical Manager and Clayton Eves, Recordkeeping Manager.

FACILITY DESCRIPTION

Monroe LLC manufactures gauge pointers as well as other components for automotive gauges and dashboards. There are four separate buildings along 40th Street which make up Monroe LLC. Essentially the facility conducts plastic injection molding, lead melting, and paint coating, and assembly. This facility is a synthetic minor source for HAPs and VOCs.

According to Mr. Bird, the company is moving operations to a new location near 44th Street and Patterson Avenue in Kentwood by July 2015. Kal indicated that most of the finishing equipment and molding machines would be moving to the new facility. The company was advised that a new permit to install application would be needed prior to installing equipment at the new facility.

COMPLIANCE EVALUATION

In Plant 1 there are 24 plastic injection molding machines exempt from permitting under Rule 286(b).

In addition, Plant 1 has one remaining lead melter used to make counter weights for gauges needles. The company uses pork suet as a fluxing agent, thus, no chlorinated compounds are used. This process is exempt from permitting under Rule 282(a)(iv) because the melter has a capacity less than 1,000 pounds. Records show that 10 pounds of lead were melted in March 2014 and no lead melted since then. The company only produces the lead counter-weights for service parts; new parts are made with brass counter-weights that are produced off-site. According to plant personnel, this equipment will not be moving to the new facility.

Plant 1 also consists of painting operations. Permit to Install No. 558-96A, EUPAINT covers six dry filter spray booths, one conveyORIZED robotic spray booth with curing oven, a mask washer and associated purge/cleanup solvent use. These booths are used to paint automotive interior plastic parts. Currently there is only one hand spray booth remaining of the original six. This booth is used primarily for samples and overflow parts and is not used regularly for production. Filters were installed and appeared well maintained. There were two spray guns associated with the booth, one high volume low pressure (HVLP) and one conventional gun. The company was advised that all spray guns should HVLP. The company does not plan to move this booth to the new facility, but rather construct a new hand spray booth. This booth should be equipped with HVLP.

The robotic booth is the primary production booth at the facility. In the robotic booth high pressure low volume (HVLP) applicators are used to apply various coatings in a totally enclosed booth. All filters were installed and operating properly. This booth is operated roughly two shifts, six days per week. Production was recently increased to accommodate downtime during the move to the new facility.

The company also has a mask washer which uses a water-based cleaner. This unit is exempt from permitting under Rule 281(e).

The company is maintaining paint usage, VOC emission records, and HAP emission records on a daily, monthly and 12-month rolling basis in accordance with permit 558-96A. Records show a variety of coatings and solvents used at the facility. All paints are sprayed in the robotic booth except for a small amount in the hand spray. Toluene is the main reducing solvent used in the coatings at the facility. The company uses Environmental Partners to update coating

information.

According to company records, the emissions for the period of April 2014 through March 2015 were as follows:

Pollutant	Emission Limit	Actual Emissions	Compliance Status y/n	Comments
VOC	29 tpy	9.68 tpy	Yes	
VOC	242 lb/day	189.62 lb/day	Yes	Highest in Mar. 2015
HAPs (total)	25 tpy	1.8 tpy	Yes	
HAPs (individual)	10tpy	<1.5 tpy (toluene)	Yes	

The company uses manufacturer's formulation data (as approved by the Air Quality Division District Supervisor) to verify coating VOC content.

MISCELLANEOUS:

Plant 2 which contained a tool and die shop and small research and development area was recently sold by Monroe LLC. Plant 3 and 4 contain assembly and storage operations, have no emission units, and no changes have been made since the last Air Quality Division inspection.

SUMMARY

Monroe LLC, appears to be in compliance with all applicable requirements. Company records are attached to this report.

NAME  DATE 5/12/15 SUPERVISOR PAB