

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

N258525144

FACILITY: A & K Finishing, Inc.		SRN / ID: N2585
LOCATION: 4175 DANVERS Ct. SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Scott Hankamp , Operations Manager		ACTIVITY DATE: 05/15/2014
STAFF: David Morgan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 9:45 A.M. on May 15, 2014, Air Quality Division staff Dave Morgan conducted an unannounced scheduled inspection of A & K Finishing located at 4175 Danvers Ct. SE in Kentwood. The purpose of the investigation was to determine the facility's compliance with air use permit to install (PTI) No. 264-04 as well as state and federal air pollution regulations. Accompanying AQD staff on the inspection was Scott Hankamp, Operations Manager.

FACILITY DESCRIPTION

A&K Finishing paints plastic, interior automotive parts. This facility consists of six coatings booths. The company is considered a synthetic minor source for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs). This facility is currently operating one, eight to ten hour shift.

COMPLIANCE EVALUATION

PTI No. 264-04, EUCOATING, is for nine manual spray coating booths, however three booths have been removed and there are now six booths. Although there is no administrative requirement to modify the permit for removed equipment, any new spray booth installations would need to obtain a new permit or demonstrated to be exempt.

Booths 1 through 5 are manual spray coating booths. Booth 6 was converted to a robotic spray booth in 2009. A conveyor belt runs between all the booths and then through an oven. The booths typically spray different types of mask coating. All of these booths operate independently and each have mat filters which are changed once per day. Filters were maintained adequately.

In addition, the company is required to use HVLP guns. During the inspection, the company had Devilbiss Compact spray guns with 506 air caps on booths 1 through 5. At the time, an electrostatic gun was also being used on Booth 1. On Booth 6, a Sata LP jet K3 HVLP robotic gun is used. All guns are HVLP compliant.

Since two component paints are used in these booths, the lines are purged with MEK solvent at breaks and equipment shutdown. All waste purge solvents and coatings were stored in closed containers and disposed in an acceptable manner.

All stacks were observed to be in compliance with applicable design requirements.

Recordkeeping:

According to company records, for the period from May 2013 through April 2014, emissions were as follows:

Condition	Pollutant	Limit	Actual	Compliance
1.1a	VOC	87.9 tons per 12-month rolling	2.78 tons	Yes
1.1b	VOC	14.6 tons/month	<0.38 tons/month	Yes
1.1c	VOC	66.6 lbs/hr	* See below	Yes
1.1d	VOC from purge	6.9 tons per 12-month rolling	0.97 tons	Yes
1.1e	VOC from purge	3.4 lbs/hr	<2.52 lbs/hr	Yes
1.1f	VOC content	5.0 lb/gal minus water	** See below	No
1.1g	VOC content red/black	5.75 lb/gal minus water	*** See below	No
2.1a	HAPs individual	9.0 tons per 12-month rolling	<0.15 tons	Yes
2.1b	HAPs total	22.5 tons per 12-month rolling	0.24 tons	Yes

*The company needs to refine its recordkeeping to more clearly show the lb/hr VOC emission rate from the coating operations. However, there was sufficient data to determine that the lb/hr VOC emission rate from the coating operations is below the 66.6 lb/hr VOC emission limit.

** Based on company records it was determined that the VOC content in lbs/gallon (minus water and exempt solvents) based on a a daily weighted average exceeded the 5.0 lbs/gallon limit for non-red and black coatings on numerous occasions from July 2013 through April 2014. Non-compliance with the coating limit occurred approximately 63% of the operating time from July 2013 through April 2014.

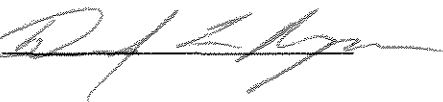
*** Based on company records it was determined that the VOC content in lbs/gallon (minus water and exempt solvents) based on a a daily weighted average exceeded the 5.75 lbs/gallon limit for red and black coatings on numerous occasions from July 2013 through April 2014. Non-compliance with the coating limit occurred approximately 28% of the operating time from July 2013 through April 2014.

These daily weighted average exceedances are in violation of EUCOATING, Conditions 1.1f and 1.1g.

It is noted that despite exceeding daily VOC content requirements, overall emissions from the facility are well below other applicable limits.

SUMMARY

A violation notice will be sent to A & K Finishing for the issues identified above. Company data has been recorded to CD and placed in the file.

NAME 

DATE 6/2/14

SUPERVISOR 