

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

N657825961

FACILITY: Almond Products Inc		SRN / ID: N6578
LOCATION: 17150 148th Ave, SPRING LAKE		DISTRICT: Grand Rapids
CITY: SPRING LAKE		COUNTY: OTTAWA
CONTACT: Kim Cooper, Environmental/Lab Supervisor		ACTIVITY DATE: 06/25/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility at approximately 10:00 AM to conduct an unannounced scheduled inspection

Staff signed in and called Kim Cooper, Environmental/Lab Supervisor who saw me right away. Chris Stebbins was seen in passing. Ms. Cooper was provided the DEQ Inspections brochure.

FACILITY DESCRIPTION

Almond Products is a coater of miscellaneous metal parts. It is currently operating under Opt-out permit No. 361-06C along with permit 340-08B for a fluidized bed sand stripper. Existing operations include two dip lines, an anodize/alodine line, four spray booths and a powder coating line. The burn-off oven referenced in PTI 361-06C has been removed.

COMPLIANCE EVALUATION

EUUDIPLINE 1

This line was in operation during the inspection. It consists of various tanks for cleaning/rinse, complex oxide and two for dip coating. The line also has curing ovens and a cool down section. The line is controlled by a thermal oxidizer.

I. EMISSION LIMITS

The emission limit values were determined from the attached records.

S.C.I.1: Limits VOC emissions to 75.0 tons per 12-month rolling time period. Reported emissions June 2013 through May 2014 are 15.70 tons.

S.C.I.2: Limits VOC emissions to 410.8 lb/day on a calendar day average. Currently, as agreed upon with a previous AQD inspector the facility is using 85% control efficiency. The average reported controlled emission on any day during the past 12 months is 112 lbs.

S.C.I.3: Limits VOC emissions to 6.7 lb/gal (minus water) as applied, prior to control. This line is consistent and the contents of the tank are closely monitored. The company utilizes an 80:20 mix ratio for the coating and additive.

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL LIMITS

S.C.III.1: The permittee appeared to be appropriately capturing waste.

S.C.III.2: Observed containers were covered while in use at the time of the inspection

S.C.III.3a-c: The data required by the MAP has been received. The facility has implemented and maintained a MAP.

IV. DESIGN/EQUIPMENT PARAMETERS

S.C.IV.1: Requires proper operation of the thermal oxidizer, including temperatures above 1,400 °F and 85% destruction efficiency. At the time of the inspection, the paper recorder and digital display appeared to be equivalent. The temperature was 1,403-1404°F at the time of the inspection. This is very close to the limit and I recommended that the set point be raised. I called Ms. Cooper on July 7th and we discussed the records I received, as a review of June 2014 temperature charts indicates that the strip chart recorded temps below 1400°F. She stated that she talked to Roger and further review indicated that the pen on the strip chart was bent. Ms. Cooper stated that this has been corrected. An additional strip chart request was made on July 7th for the first week of July. Ms. Cooper responded that line was down all that week, and therefore the oxidizer did not run. A review of the week ending July 13th indicated temperatures right at 1,400°F. Ms. Cooper does not appear to have had the set point increased. This will be monitored randomly over the next year.

V. TESTING/SAMPLING

S.C.V.1: The permittee has received approval for using manufacturer's formulation data.

VI. MONITORING/RECORDKEEPING

S.C.VI.1: The permittee has records in a format acceptable.

S.C.VI.2: The permittee has continuously monitored temperatures of the thermal oxidizer.

S.C.VI.3: The permittee has been working on maintaining a current list.

S.C.VI.4a-e: The required records are being maintained.

S.C.VI.5: The facility maintains all strip chart records for the thermal oxidizer as required.

VII. NA

VIII. STACK/VENT RESTRICTIONS

S.C.VII.1: There have been no changes.

OTHER REQUIREMENTS

IX. NA

EUDIPLINE1 appeared to be in compliance at the time of the inspection.

EUDIPLINE2

This emission unit is in operation, however it is only utilizing low VOC water based coating at this time. The thermal oxidizer is currently not being operated and stack testing for solvent coating use has been deferred until the facility begins to use solvent coating. No current plans for that are in the works. The company did mention that the unit is there for back up to the main line in case of an emergency shut down. Staff indicated that that would be fine, however there are testing requirements that must be conducted within 180 days of solvent start up.

EMISSION LIMITS

S.C.I.3: Limits VOC emissions from the line are limited to 21.8 tons per year. The facility currently is reporting 1.02 tons.

S.C.I.2: (incorrect numbering noted, but as listed on PTI) Limits VOC emissions to 161.3 lbs/day. On average, the line uses less than this on a monthly basis.

MATERIAL LIMITS

NA

PROCESS/OPERATIONAL RESTRICTIONS

S.C.III.1: Staff did not observe incorrectly stored waste.

S.C.III.2: Observed containers were covered while in use at the time of the inspection.

S.C.III.3: No odors were observed in the room. It is additionally noted, that this condition is required for solvent based coating use.

S.C.III.4.a-c: The facility has implemented and maintained a MAP.

DESIGN/EQUIPMENT PARAMETERS

S.C.IV.1 & 2: No solvent coating is in use so this condition does not apply.

TESTING/SAMPLING

S.C.V.1: Permittee has received approval for using manufacturer's formulation data.

S.C.V.2: Trial operation has not commenced for solvent coating use, therefore this condition does not apply.

MONITORING/RECORDKEEPING

S.C.V.I.1&2: Permittee is not operating the thermal oxidizer so this does not apply.

S.C.V.I.3: Permittee is using an acceptable record format.

S.C.V.I.4: Permittee has been working on maintaining a current list.

S.C.V.I.5.a: Permittee is maintaining record of gallons used.

S.C.V.I.5.b: Permittee will need to make some changes on the daily recordkeeping.

S.C.V.I.6.a-c: This appears correct.

S.C.V.I.7: No NDO records need to be kept currently.

S.C.V.I.8: No thermal oxidizer records are being generated as it is not in use.

S.C.V.III.1: The stack is as installed.

EUDIPLINE2 appeared to be in compliance at the time of the inspection.

EUCOATING

This area contains four booths two prime and two topcoat, and only extreme performance coatings are currently in use. The mix area looked fine, and no open solvent or paint containers were noted.

EMISSION LIMITS

The emission limit values were determined from the attached records.

S.C.I.1: VOC and acetone combined limit 50 tpy on a 12-month rolling time period. Reported emissions through May 2014 are 17.15 tons.

S.C.I.2: VOC and exempt solvents combined daily emissions limit 1044 lb/day. Highest reported daily amount for past 12-months was on February 26, 2014 and was 286.62 pounds.

S.C.I.3: Combined dibasic esters limited to 2.37 tpy. Current reported usage through May of 2014 is 0.187 tons.

S.C.I.4: VOC's in clear coats limited to 4.3 lb/gal on a volume weighted daily average. Extreme performance clear coatings are rarely used.

S.C.I.5: VOC's in extreme performance coatings limited to 3.5 lb/gal on a volume weighted daily average. The records provided indicate compliance.

MATERIAL LIMITS

S.C.II.1: The facility uses only extreme performance coatings.

S.C.II.2: The facility is limited to 27,000 gallons of tan topcoat (F93H112 new tan). This was replaced with the F93H112, and that has been replaced by the Hentzen 08609TUZ-GD Tan and therefore the condition does not

specifically apply. The facility is aware that any coating changes require a Rule 285 meaningful change demonstration prior to making the change.

PROCESS/OPERATIONAL RESTRICTIONS

- S.C.III.1: The permittee appeared to be appropriately capturing waste.
- S.C.III.2: Staff did not observe a filter change.
- S.C.III.3: Observed containers were covered while in use at the time of the inspection.

DESIGN/EQUIPMENT PARAMETERS

- S.C.IV.1: The appeared to be appropriately maintained
- S.C.IV.2: The facility is using both HVLP and electrostatic spray guns.

TESTING/SAMPLING

- S.C.V.1: The permittee has written approval to utilize manufacturer's formulation data for VOC emissions.

MONITORING/RECORDKEEPING

- S.C.VI.1: The permittee is completing required calculations by the 15th of the month.
- S.C.VI.2: Permittee has been working on maintaining a current list.
- S.C.VI.3a-i: The permittee is currently meeting all requirements. See attached records.
- S.C.VI.4.a: The permittee only uses one coating that contains dibasic ester, the F59A.
- S.C.VI.4.b: The permittee does not reclaim.
- S.C.VI.4.c: This information has been provided.
- S.C.VI.4.d: This information is maintained.
- S.C.VI.4.e: Current 12-month rolling time period total is 0.187 tons.

REPORTING

- S.C.VII.1: No change in land use has occurred.

STACK/VENT RESTRICTIONS

S.C.VIII.1-5: A roof inspection was not conducted during this site visit. Visual observation from the outside did not indicate any changes in stack configuration.

EUCOATING appeared to be in compliance at the time of the inspection.

EUBURNOFF

The burn-off oven has been removed from the facility.

EUANOD/ALOD

The facility is making some modifications to this line and is already in the process of installing ceramic dip coating tanks. Ms. Cooper indicated that FTC&H was in the process of evaluating the new line to see if it requires a permit or not. Staff requested the evaluation which was received on 7/15/14. The rationale used is acceptable, however no MSDS's were provided and the equipment will be observed at some point to verify that it is not externally vented. The tanks are currently being installed directly adjacent to fume hoods that vent to the wet scrubber that controls the anodize/alodine tanks.

EMISSION AND MATERIAL LIMITS

S.C.I-II: NA

PROCESS/OPERATIONAL RESTRICTIONS

- S.C.III.1: The permittee appeared to be appropriately capturing waste.
- S.C.III.2: Containers were covered when not in use at the time of the inspection.
- S.C.III.3.a-c: The facility has implemented and maintained a MAP.

DESIGN/EQUIPMENT PARAMETERS

- S.C.IV.1: The fume scrubber appeared to be installed and operating properly.

V-IX: NA

EUANOD/ALOD appeared to be in compliance at the time of the inspection.

FG FACILITY

EMISSION LIMITS

- S.C.I.1: Limits each individual HAP to less than 9.0 tons per 12-month rolling time period. Reported highest individual HAP was toluene.
- S.C.I.2: Limits aggregate HAPs to less than 22.5 tons per 12-month rolling time period. Reported aggregate HAPs for the 10 months requested is 6.97 tons.
- S.C.I.3: Limits VOCs to less than 90.0 tons per 12-month rolling time period. Reported VOC emissions are 29.49 tons.
- S.C.V.1: The permittee appears to be accurately accounting for HAP contents.
- S.C.V.2: The permittee has written approval to utilize manufacturer's formulation data for VOC emissions.
- S.C.VI.1: The permittee is completing required calculations by the 15th of the month.
- S.C.VI.2.a-e: The permittee appears to be properly maintaining HAP records.
- S.C.VI.3.a-e: The permittee appears to be properly maintaining VOC records.

PTI No. 340-08C EUSANDSTRIPPER

EUSANDSTRIPPER was re-permitted in August of 2013. Pollution control equipment is a secondary afterburner and a ceramic element filter particulate control. The unit was not in operation at the time of the inspection. The permit was modified to remove the lime injection rates from the permit language.

I. EMISSION LIMITS

Emission limits are established for PM, PM10, PM2.5, hydrogen chloride and hydrogen fluoride. Stack testing is the basis of compliance for the hourly limits. Stack testing for HCl and HF was conducted and indicates compliance with no lime injection.

II. MATERIAL LIMITS

The permittee is required to keep track of batches that contain chromium compounds, manganese compounds and epoxy resins separately. This is being done.

III. PROCESS/OPERATIONAL RESTRICTIONS

- S.C. III.1: Requires the implementation of a MAP. This has been done and is dated 10/1/13.
- S.C.III.2-3: The unit appears to be properly utilized.

IV. DESIGN/EQUIPMENT PARAMETERS

S.C. IV.1-4: Requires proper operation for the unit and control equipment, including maintaining the afterburner at 1,560 °F and operating the lime injection system in a satisfactory manner in accordance with an approved MAP. Temperature records indicate all temperatures remained above 1,560 °F.

V. TESTING/SAMPLING

Testing was conducted and found sufficient.

VI. MONITORING/RECORDKEEPING

The permittee is maintaining records as required.

EUSANDSTRIPPER was in compliance at the time of the inspection.

Consent Order AQD No. 12-2013

The AQD is not citing any violations at this time, therefore the facility is in compliance with the Consent Order.

SUMMARY

While staff could have cited the issues with the EUDIPLINE1 afterburner in violation, at this time staff will monitor it with regard to the company's explanation that the pen was bent at the chart recorder.

Almond Products, Inc. was in compliance at the time of the inspection.

NAME 

DATE 7-17-14

SUPERVISOR PAB