

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

B754673289

<b>FACILITY:</b> HAMMOND ROTO-FINISH		<b>SRN / ID:</b> B7546
<b>LOCATION:</b> 1600 DOUGLAS AVE, KALAMAZOO		<b>DISTRICT:</b> Kalamazoo
<b>CITY:</b> KALAMAZOO		<b>COUNTY:</b> KALAMAZOO
<b>CONTACT:</b> Kyle Elmlad , Vice President of Quality		<b>ACTIVITY DATE:</b> 08/20/2024
<b>STAFF:</b> Michael Cox	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled Unannounced Inspection		
<b>RESOLVED COMPLAINTS:</b>		

Air Quality Division (AQD) staff Michael Cox (MTC) completed a scheduled unannounced inspection of Hammond Roto-Finish (HRF) at 9:20 AM on August 20, 2024, located at 1600 Douglas Avenue, Kalamazoo, Michigan. The purpose of the inspection was to verify compliance with state and federal air pollution regulations as well as compliance with Permit to Install (PTI) No. 113-12 and PTI No. 200-95. Visible emissions and odor observations were taken prior to entering the facility. No visible emissions or odors were noted.

### Facility Description

HRF manufactures robotics, CNC and high-speed automation machines. HRF also produces a range of vibratory and other loose abrasive finishing equipment and supplies. HRF employs about 50 people and operates one 8 to 12-hour shift per day, 5 days per week.

### Regulatory Analysis

HRF is a minor source for volatile organic compounds (VOCs), hazardous air pollutants (HAPs), sulfur oxides (SOx), nitrogen oxides (NOx), particulate matter (PM), and carbon monoxide (CO). The facility is currently operating under PTI 200-95 and PTI 113-12. PTI No. 200-95 was issued on July 14, 1995, and covers the facility's coolant evaporator. PTI No. 113-12 was issued on September 11, 2012, and covers the facility's burn-off oven.

### Compliance Evaluation

Upon entering the facility, AQD staff MTC met with Mr. Kyle Elmlad, Vice President of Quality, and explained the purpose of the inspection. Mr. Elmlad provided a walk-through of the facility, answered site-specific questions and provided the records requested during the inspection.

#### **PTI No. 200-95:**

PTI No. 200-95 covers the facility's coolant evaporator which has an 80-gallon capacity. No visible emissions were observed from the emission unit while on-site. The coolant evaporator was noted to be venting unobstructed, vertically, and appeared to be consistent with the dimensions listed in PTI No. 200-95. The coolant evaporator is limited to 900 gallons of throughput per a 12-month rolling time period. Records were reviewed for the time period of January 2023 through August 2024. The records were hard to read due to poor scanning, but Mr. Elmlad clarified that the throughput for the coolant evaporator was 360 gallons for the 2023 calendar year and 220 gallons so far through calendar year 2024.

**PTI No. 113-12:**

PTI No. 113-12 covers EU-UB001, which consists of a batch type natural gas-fired burn-off oven with an integral afterburner, and is used to remove polyurethane coatings, cured paints, oil or grease from metal parts by thermal decomposition in a primary chamber. The burn-off oven was undergoing maintenance at the time of the inspection and was not in operation. The burn-off oven was confirmed to burn only natural gas and to process only polyurethane coated parts. A chart recorder is installed on the burn-off oven which keeps track of combustion temperature as well as burn date and duration. The chart records were reviewed on-site for the time-period covered by this inspection. After reviewing the charts, it appears that the burn-off oven consistently operates at or above the 1,400°F minimum temperature requirement. The burn-off oven is also equipped with a digital automatic temperature monitor and controls. The burn-off oven is also equipped with an interlock system that shuts down the primary chamber burner in the event the afterburner is malfunctioning. As stated above, polyurethane is the only coating being processed through the burn-off oven. A Material Safety Data Sheet was provided for the cured polyurethane which shows that the VOC weight percent is less than 0.1%

**Additional Observations:**

- Welding operations were noted on-site. The welding operations appear to be exempt from Rule 201 permitting per Rule 285(2)(i).
- Three paint booths were observed during the inspection. The paint booths were noted to have dry fabric filters installed to collect overspray. Paint records were provided for each paint booth. The highest paint usage occurred during the month of March 2024 when 75.125 gallons of paint was used for all three booths. The paint booths appear to be exempt from Rule 201 permitting per Rule 287(2)(c).
- The facility has 3 parts washers. The parts washers were noted to be closed and not in use. The parts washers are exempt from Rule 201 permitting per Rule 281(2)(h).

**Compliance Determination:**

**Based on the observations made during the inspection and review of the required records, Hammond Roto-Finish appears to be in compliance with PTI No. 200-95 and PTI No. 113-12, as well as all other State and Federal Air Pollution rules and regulations.**

NAME Michael T. CoxDATE 8/28/2024SUPERVISOR Monica Brothers