

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

N270225875

FACILITY: Kay Automotive Graphics		SRN / ID: N2702
LOCATION: 57 Kay Industrial Dr., LAKE ORION		DISTRICT: Southeast Michigan
CITY: LAKE ORION		COUNTY: OAKLAND
CONTACT: Joshua Flood , EHS Compliance Admin		ACTIVITY DATE: 06/09/2014
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Annual Inspection of a Synthetic Minor Source		
RESOLVED COMPLAINTS:		

On June 9, 2014 I conducted a level 2 Scheduled Inspection at Kay Automotive Graphics (Kay), located in Lake Orion, Oakland County. The purpose of the inspection was to determine Kay's compliance with the requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, the administrative rules, and the conditions of PTI No. 305-05G, and PTI No. 305-05H . Mr. Joshua Flood, and Mr. Mike Kozik represented Kay during the inspection.

#### UPDATE ON THE PROCESS DISCRIPTION

- PTI No. 305-05H was issued to Kay on 1/3/14 to reflect the addition of a new printing line (EU-PRINT012). No emission limitations were altered.
- PTI No. 305-05G was issued to Kay on 1/15/13 to reflect the addition of a new printing line (EU-PRINT012). No emission limitations were altered.

#### COMPLIANCE STATUS W/PTI No. 305-05B

- Kay provided the attached Emission Data Reports, Attachments A-D, in support of the compliance status. The reports provided emission data for the period Jan - December, 2013, and Jan – May, 2014.

#### EG-SCREENWASH:

Screen wash process of the printing screens used in the printing process. Printing screens are solvent washed on either the printing line itself or in a special room.

\* S.C. #I.1.a & b - VOC weekly and annual limits are 684 lb/wk and 10 tpy based on a 12-month rolling time period, respectively.

- The maximum VOC emission of 467 lb occurred during the week of 8/17/13.

#### Attachment A.1

- The maximum VOC emission of 370 lb occurred during the week of 3/22/13.

#### Attachment A.2

- The VOC emission data showed 6.52 tpy for the period 1/13 - 12/13.  
Attachment A.1

- The VOC emission data showed 6.99 tpy for the period 7/13 - 3/14.  
Attachment A.2

- Reclamation: Reclamation data are being kept in Kay's Plant File.

\* S.C. #VI.3.a - Keep a separate record of the weekly usage and amount reclaimed, in gallons, and VOC content, in pounds per gallon, of each screen wash solvent.

- Attachment B shows the above record.

#### FG-LINES/OVENS

\* S.C. #2.1.a VOC emission limit: 771 lb/day

- The maximum VOC emission rate averaged 320 lb/day in 10/14. Attachment A.1

- The maximum VOC emission rate averaged 307 lb/day in 5/14. Attachment A.2

\* S.C. #2.1.b VOC annual emission limit: 75.0 tpy

- The VOC emission rate, based on 12-month rolling period, for 1/13 – 12/13 was 20.1 tpy. The data are in compliance with the 75 tpy limit.  
Attachment A.1

\* S.C. #2.1.c - VOC content in Inks: 6.5 lb/gal

- The maximum VOC content in the inks was 6.4 lb/gal in 1, 2, 4, 5 & 6/13.

#### Attachment A.1

\* S.C. #2.1.d - VOC content in Clear coats: 4.8 lb/gal

- The maximum VOC content in the clear coats was 4.7 lb/gal in 1, 2, & 7/13.

#### Attachment A.1

\* S.C. #2.2 - Testing/Sampling-The VOC content of clear coats and inks (coatings), as applied, minus water, shall be tested using Method 24.

- In a letter, dated July 25, 2006, the DEQ/AQD granted Kay a conditional approval of Kay's request for permission to use manufacturer's formulation data in place of federal Reference Test Method 24 to determine VOC content of inks and clear coatings (coatings), as applied.

#### FG-FACILITY

\* S. C. #3.1 & b - Single and aggregate HAP Annual limits are <9.0 tpy and <22.5 tpy, respectively, based on a 12-month rolling time period.

- The maximum single HAP (EB Acetate) emission of 2.34 tpy was reported for the period 1/13 - 12/13. Attachment C

- The maximum aggregate HAP emission of 4.06 tpy was reported for the period 1/13 - 12/13. Attachment C

\* S.C. #3.1.c - VOC Annual emission limit is <90.0 tpy.

- The annual VOC emission rate of 27.02 tpy was reported for 1/13 – 12/13.

#### Attachment A.1

- Attachment D shows compliance with S.C. #VI.2.a, c, d and # VI.3.a.

#### CONCLUSION

Kay appears to operate in compliance with the provisions of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, the administrative rules, and the conditions of PTI No. 305-05G, and PTI No. 305-05H.

NAME U. Sam Amer DATE 7/15/14 SUPERVISOR CJE

