



STATE OF MICHIGAN
 DEPARTMENT OF
 ENVIRONMENT, GREAT LAKES, AND ENERGY
 GRAND RAPIDS DISTRICT OFFICE



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

August 25, 2020

Mr. Scott Hancamp
 A & K Finishing, Inc.
 4436 Donker Court, SE
 Kentwood, Michigan 49512

SRN: N5155, Kent County

Dear Mr. Hancamp:

VIOLATION NOTICE

On July 15, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of A & K Finishing, Inc. located at 4436 Donker Court, SE, Kentwood, Michigan. The purpose of this inspection was to determine A & K Finishing, Inc.'s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 21-07D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-LINE4	Rule 632	Exceeded 5.0 lb/gal (minus water) as applied daily volume-weighted average VOC limit on 60 days from February-June 2019
EU-LINE2	Rule 632 and PTI No. 21-07D, FG-COAT, Special Condition I.6	Exceeded Rule 632 lb/gal (minus water) as applied daily volume-weighted average VOC limit on February 2, 2020
EU-LINE4	PTI No. 21-07D, FG-COAT, Special Condition I.7	Exceedance of 12.9 lb/yr 12-month rolling cumene emission limit
FG-COAT	PTI No. 21-07D, FG-COAT, Special Condition I.5 & I.6	Failure to properly report as applied VOC content

Process Description	Rule/Permit Condition Violated	Comments
FG-COAT	PTI No. 21-07D, FG-COAT, Special Condition V.1	Failure to determine VOC content from formulation data as approved
EU-LINE4	Rule 201	Use of new coatings without PTI. Meaningful change demonstration not acceptable
FGFACILITY	PTI No. 21-07D, FGFACILITY, Special Condition II.1	Exceeded maximum VOC content with water as applied limit
FGFACILITY	PTI No. 21-07D, FGFACILITY, Special Condition V.1 and V.2	Failure to determine HAP and VOC content from formulation data as approved

During this inspection, AQD staff found that EU-LINE4 had exceeded the Rule 632 exemption limit of 2,000 lbs. of VOC in January 2019. This triggered applicability of the daily volume-weighted average coating content limit in Table 66 of Rule 632. The applicable VOC daily volume-weighted average limit of 5.0 lb/gal (minus water) as applied was exceeded in February – June 2019. After a new PTI was issued in July 2019, EU-LINE4 continued to exceed the applicable daily volume-weighted average limit. A & K Finishing began using coatings with a low VOC content in September 2019 to reduce the daily volume-weighted averaged use on EU-LINE4. A Meaningful Change demonstration was requested; however, it was not done correctly, and compliance could not be determined. Furthermore, using a 16 year-old and 13 year-old Safety Data Sheet to demonstrate compliance is not acceptable and does not meet permit requirements for formulation data. Finally, it was noted that 8 coatings being used are above the 6.5 lb/gallon VOC content limit per PTI No. 21-07D, FGFACILITY, SC II.1.

In 2018, A & K Finishing received AQD permission to utilize formulation data to determine the volatile organic compound (VOC) content of coatings. During the inspection, it was discovered that A & K Finishing is not using formulation data to determine this information for the majority of the coatings evaluated. Therefore, A & K Finishing must determine VOC content, for a certain amount of coatings annually, using Reference Method 24 as per PTI No. 21-07D, FG-COAT, SC V.1. Since formulation data is required for determining the hazardous air pollutant (HAP) content in FGFACILITY, SC V.1, and it is not being conducted, A & K Finishing must determine HAP content, for a certain amount of coatings annually, using Reference Method 311. A coating sampling plan shall be submitted to the Grand Rapids District Supervisor for approval by September 15, 2020.

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It is noted that because the proper documentation for determining VOC and HAP coating content is not being utilized, the reported emissions for both may be inaccurate.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 15, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If A & K Finishing, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of A & K Finishing, Inc.. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE