



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION



PHILLIP D. ROOS
DIRECTOR

November 14, 2024

Scott Hankamp
A & K Finishing, Inc.
4436 Donker Court
Kentwood, Michigan 49512

SRN: N5155, Kent County

Dear Scott Hankamp:

VIOLATION NOTICE

On October 15, 2024, 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, 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 21-07E.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Automotive plastic parts coating lines EU-LINE1 and EU-LINE2	PTI No. 21-07E, FG-COAT, Special Condition I.6	Each line exceeded daily volume-weighted average once during the previous 12-months.
Automotive plastic parts coating line EU-LINE4	PTI No. 21-07E, FG-COAT, Special Condition I.7	Exceeded cumene limit for previous 12 consecutive months.
Automotive plastic parts coating line EU-LINE4	PTI No. 21-07E, FG-COAT, Special Condition VI.3.c	Failure to properly calculate daily volume weighted average.
Automotive plastic parts coating lines FGFACILITY	PTI No. 21-07E, FGFACILITY, Special Conditions II.1, 2, 3, 4, 5, and 7	Exceeded source-wide material limits in 6 different coating groups.
Automotive plastic parts coating lines FGFACILITY	PTI No. 21-07E, FGFACILITY, Special Conditions VI.4 and VI.5	Failure to identify usage of isopropyl alcohol source-wide or calculate emissions.

During the inspection recordkeeping review, the AQD identified that both EU-LINE1 and EU-LINE2 exceeded a daily volume-weighted average limit once in the 12-month period evaluated. The facility also exceeded the cumene emission limit in each of the 12-months of the period evaluated. These are violations of the emission limits established in PTI No. 21-07E, FG-COAT, Special Conditions I.6 and I.7. It was also identified that the recordkeeping for

EU-LINE4 did not include all coatings used in the daily volume-weighted average calculations, and as such compliance with the coating content limit for that line is unknown. The permit contains material limits on coatings in seven different categories based on the volatile organic contents. The facility exceeded the material limits in six of those categories, in each of the 12-months of the period evaluated. These are violations of the material limits established in PTI No. 21-07E, FGFACILITY, Special Conditions II.1, II.2, II.3, II.4, II.5, and II.7.

Finally, the facility uses isopropyl alcohol (IPA) to wipe parts prior to coating, however, the IPA usage is not identified in the recordkeeping. As such, this is a violation of FGFACILITY, Special Conditions VI.4 and VI.5.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 5, 2024 (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 April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or LazzaroA1@Michigan.gov and submit a copy to 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: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE