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

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FACILITY: MSM Blasting and Painting, LLC		SRN / ID: N6987
LOCATION: 2100 17 Mile Road, KENT CITY		DISTRICT: Grand Rapids
CITY: KENT CITY		COUNTY: KENT
CONTACT: Lisa Singleton , Owner		ACTIVITY DATE: 10/12/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unanno	unced inspection.	
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the MSM Blasting and Painting, LLC (MSM) facility located in Kent City, MI at 9:27am on October 12, 2018 to complete a scheduled unannounced inspection.

Facility Description

Prior to entering the facility, off-site odor and visible emissions observations were completed. The weather conditions at the time of the inspection were winds from the north/northwest at 0-5mph, low 40's °F and cloudy skies. No identifiable odors were noted coming from the site and no visible emissions were observed.

Upon arrival AQD staff AS met with Ms. Lisa Singleton, Owner, and later Mr. Jim McIntyre, Owner, who both provided a tour of the facility and answered site specific questions. Additionally, Ms. Singleton provided requested records at the end of the inspection. During the site inspection the booths, and ovens were not in operation.

MSM is a finishing and coating facility mainly of structural steel. The facility operates one shift Monday through Friday. The site is in operation with one General Permit to Install (PTI) No. 224-01 for a coating line.

PTI No. 224-01

FG-Coating

This emission unit is for the one coating line, all associated purge and clean-up operations, and any associated flash-off areas, drying areas, and ovens.

During the inspection, coatings, waste coatings and solvents appeared to be properly stored in closed containers. Waste materials are picked up and transferred off site on a monthly basis by Heritage Crystal Clean. One water based paint spray applicator and four regular paint based spray applicators were used in the coating line. MSM appears to be using high volume-low pressure (HVLP) spray applicators. Spray tips for the applicators are replaced on an as needed basis. MSM utilizes dry filters as a control for the coating line. During the inspection minor gaps were observed around the filters and MSM staff were advised to reduce these air gaps in order to satisfactorily control emissions. Filters for the coating line are changed every few weeks.

Per Special Condition (SC).VI.3.a-e, MSM shall keep the following information: purchase orders and invoices for all coating materials used, volatile organic compounds (VOC) contents for all coating materials used, usage and reclaim of materials used, and monthly/12-month rolling total VOC emissions. Purchase orders and invoices were reviewed on site. Usage records and several product data sheets were also provided while on site. Based on the

records reviewed, MSM appears to be adequately keeping track of purchase orders/invoices of all materials used, usage rates and VOC contents of all materials used. MSM does not reclaim any materials used.

This emission unit is subject to a material limit of 2,000 lbs of VOCs per month and 10 tons per year (tpy) of VOCs per a 12-month rolling total. Monthly and 12-month rolling total emission records were requested and reviewed back to September 2017. For the month of September 2018, 60.33 lbs of VOCs were emitted, which is well within the permitted limit. The 12-month rolling total for VOCs, as of September 2018, was 1.03 tpy, which is well within the permitted limit. Previous monthly and 12-month rolling totals were also well within permitted limits.

One stack was observed in association with this emission unit. The stack was observed venting unobstructed vertically.

FG-Source

MSM is subject to a facility wide VOC emission limit of 30 tpy per a 12-month rolling total. Based on the records reviewed, MSM is well within the permitted limit.

Additional Observations

- One powder coating booth was observed with an associated oven. The company utilizes dry filters for this booth and they are changed as needed. The powder coating paint booth and associated oven appear to be exempt per Rule 287(2)(d).
- One shot blasting room was observed where parts are shot blasted with steel grit. Particulate matter (PM) emissions collected during shot blasting go through a settling machine to collect heavier material followed by a dust collector located along the exterior portions of the building. The filters for the dust collector are changed once a year per manufactures recommendations and the collected particulate is cleaned out once a week. The shot blasting operation observed appears to be exempt per Rule 285 (2)(I)(vi)(c).

Conclusion

Based on the records reviewed and the facility walk through, MSM appears to be in compliance with General PTI No. 224-01 and applicable air pollution control rules.

NAME adam & Shaff

DATE 10/24/18

SUPERVISOR