

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

N753346632

FACILITY: NORTHERN LIGHT REFINISHING INC		SRN / ID: N7533
LOCATION: 157 BEECH ST, CEDAR SPRINGS		DISTRICT: Grand Rapids
CITY: CEDAR SPRINGS		COUNTY: KENT
CONTACT: Dennis Holtzlander , General Manager		ACTIVITY DATE: 10/12/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Northern Lights Refinishing (NR) facility located in Cedar Springs, MI at 11:00am 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 5-10mph, 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 Mr. Dennis Holtzlander, General Manager. NR was not in production on Friday; however, Mr. Holtzlander provided a tour of the facility and answered site specific questions. AQD staff AS followed up with Ms. Bosworth of NR for all applicable records following the site inspection.

NR is a remanufacturing company of automotive lights and their housings. The site is in operation with one General Permit to Install (PTI) No. 262-05 for a coating line. The site currently operates two shifts, Monday through Thursday, and one shift on Friday. Additionally, the coating operations are not in operation on Friday. No significant changes have occurred to the site since the last inspection.

### PTI No. 262-05

#### 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.

NR only utilizes one coating material for the coating line. Coating materials, waste materials and solvents observed were properly stored in closed containers. NR appears to be utilizing high volume-low pressure (HVLP) spray applicators and replaces all tips as needed. NR utilizes dry filters for their control of the paint booth. The filters appeared to be in good condition with no significant air gaps observed. NR has in place a magnehelic gauge for the paint booth to identify when the filters need to be changed. The range observed was 0.035 – 0.2 inch of water column. NR staff stated that when the pressure drop nears the upper limit they replace the filters. The paint booth was not in operation during the inspection. The oven associated with the paint booth is electrically heated and NR heats it to 160°F during operation. Per Special Condition (SC).VI.3.a-e, NR shall keep the following information: purchase orders and invoices for all coating materials used, volatile organic compound (VOC)

contents for all coating materials used, usage rates and any reclaim of materials used, and monthly/12-month rolling total emissions. Safety Data Sheets were provided for materials used. Additionally, purchase orders, invoices and usage rates were requested and provided for select months. Based on the records reviewed, NR appears to be adequately keeping track of purchase orders/invoices of materials used, usage rates and VOC contents of materials used. NR 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 reviewed back to October 2017. Minor errors were noted upon reviewing the requested records. These errors were discussed with NR staff with corrected records being resubmitted. For the month of September 2018, 65.55 lbs of VOCs were emitted, which is well within the permitted limit. The 12-month rolling total for VOCs, as of September 2018, was 0.45 tpy, which is well within the permitted limit. Previous monthly and 12-month rolling totals were also within permitted limits. Two stacks were observed in association with this emission unit. The stacks were observed venting unobstructed vertically.

#### FG-Source

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

#### Additional Observations

- A sanding area was observed with emissions being vented internally. The sanding area appears to be exempt per Rule 285(2)(l)(vi)(B).
- A plastic mold injection area was observed during the inspection. The equipment observed appears to be exempt per Rule 286(2)(b).
- One additional paint booth was observed during the inspection. Previously, NR had operated this paint booth with aerosol cans. On July 31, 2018 NR had switched from aerosol cans to regular painting operations. Monthly usage rates for the paint booth were requested and provided for August and September 2018. The highest usage was in August 2018, where 16 gallons of coating material was used. At the time of the inspection minor air gaps were observed in the dry filters used. NR staff were advised to reduce the air gaps when the paint booth was in operation in order to satisfactorily control emissions. Based on the observations made, the paint booth appears to be exempt per Rule 287(2)(c). Upon review, the emissions from this paint booth had not been incorporated into FG-Source. This was discussed with NR staff and moving forward, the monthly calculated emissions shall be included in FG-Source.

#### Conclusion

Based on the review of the records provided and the facility walk through, NR appears to be in compliance with General PTI No. 262-05 and applicable air pollution control rules.

NAME Adam F. Snaffin

DATE 11/05/18

SUPERVISOR 