

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

A244848340

FACILITY: Michigan Custom Packaging, LLC		SRN / ID: A2448
LOCATION: 3761 EASTERN AVE SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Thomas Lilley, President		ACTIVITY DATE: 02/13/2019
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Thomas Lilley, Owner. I explained to Mr. Lilley that the purpose of the inspection was to determine compliance with the Opt-out Permit to Install that was issued in September 2018 and to observe facility operations.

#### FACILITY DESCRIPTION

Michigan Custom Packaging, LLC is a contract commercial metal furniture remanufacturing facility. The paint booth was installed in January 2018 to use in a contract with another facility to paint commercial shelving units for reuse, and a permit was issued by AQD in September 2018 to limit facility-wide Hazardous Air Pollutants. There is a second company that operates out of this building named Michigan Coating Products. The second company is a small-scale paint manufacturing operation, making small batches of coating and filling 5-gallon containers in the formulation room and filling aerosol cans using a can fill machine.

I also learned that the contract for the painting work being done at the facility was recently cancelled, and Mr. Lilley provided an email from the contract company stating that (attached).

#### REGULATORY DISCUSSION

Mr. Lilley indicated that he was not familiar with the recordkeeping requirements of the permit but knew there were records by the booth itself. He did not believe he had any records to show compliance with the permit, and overall was not familiar with the requirements. I explained that part of the reason for the inspection was because of the new permit. The AQD likes to inspect companies that have new permits relatively soon after issuance because if there's any concerns on what need to be done to meet compliance, it can be quickly addressed. I later learned that the records are provided to Jeff Jaklowski, friend and consultant who inputs the coating usage into a spreadsheet.

We walked directly to the paint booth area, and I immediately noticed and pointed out to Mr. Lilley that cleanliness is an issue in the area. There were multiple small containers of what appeared to be solvent that were open in the area. We discussed how that isn't allowed for air quality purposes, but also that it is a money saving operating procedure if they keep lids on all containers that aren't currently in use as required. I observed a recordkeeping sheet on a work bench that appeared to be up-to-date. These sheets are provided to the consultant who puts the data (attached) into the emissions tracking database.

I requested the data from Mr. Jaklowski, who sent data in a series of emails. AQD was provided a 12-month total of HAP data for the time period of March 2018-March 2019. The permit wasn't issued until September 2019, however since the booth was installed in January, data is available for the time period before that. Reported highest HAP were xylenes and toluene which had the exact same amount of emissions for the time period of 3.39 tons each. Total HAP for that time frame was 7.05 tons.

During the evaluation of emissions, I noted that the monthly emissions and usage are above exempt levels and the booth itself is not permitted. When I inquired about this, Mr. Jaklowski responded that the booth was permitted under the General Permit to Install. I informed him that it was not permitted, and that since the facility conducts metal parts coating it is ineligible for that permit. As such, the booth is not permitted through New Source Review.

Further review of the monthly records showed that Volatile Organic Compound (VOC) emissions for the month of July 2018 were 2,365.23 pounds. Rule 336.1702 states that a person responsible for a new

source of VOC emissions shall not cause or allow the emission of VOC from the new source in excess of the lowest maximum allowable emission rate of the following: (d) The maximum allowable emission rate specified in part 6 of these rules. Rule 336.1610(7) states, in part, "If the combined actual emission rate equals or is more than 100 pounds per day for a subsequent day or 2,000 pounds per month for a subsequent month, then this rule shall permanently apply to the coating lines." As such, it appears that Rule 336.1610 applies to this booth at the facility, and limits VOC as detailed in Table 63 of Rule 336.1610. Table 63 A.4, limits Pounds of VOC emitted per gallon of coating, minus water, as applied for the coating of metal furniture to 3.0. This indicates that starting in the subsequent month, the source is limited to the 3.0 lb/gallon of coating, minus water, as applied limit. As indicated in the attached records, on the majority of days, the lb VOC per gallon of coating is over 5.0. This is a violation of Rule 610.

A discussion was held between myself, Vrajesh Patel, AQD Permit Section and the consultant. He agreed that even though the booth is not in use, they will apply for a New Source Review permit, and recognize that they can only use water based coatings that comply with the Part 6 and Part 7 VOC rules.

#### CONCLUSION

Two violations were identified above in the regulatory discussion of the report. However, I received information from the owner, Tom Lilley that the booth would cease operations as of March 22, 2019. Per this report, the facility should be aware that prior to using the booth for a coating operation in the future, a New Source Review permit to install shall be obtained. Also as indicated the booth is subject to Rule 610 so any coating of metal parts is limited to 3.0 lb VOC/gallon of coating, minus water, as applied.

At this time, due to the fact that the booth is no longer in operation, a Violation Notice will not be issued.

NAME



DATE

4-18-19

SUPERVISOR

