

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

A272225349

FACILITY: EXPERT COATING CO INC.		SRN / ID: A2722
LOCATION: 2855 MARLIN COURT NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Erik Klimek , President		ACTIVITY DATE: 05/29/2014
STAFF: Jenifer Dixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to complete a scheduled inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations, Permit No. 317-74 as well as to request a PTE demonstration.		
RESOLVED COMPLAINTS:		

This was an unannounced inspection. An "Environmental Inspections" brochure was provided at the time of the inspection.

The purpose of this inspection was to complete a scheduled inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations, Permit No. 317-74 as well as to request a PTE demonstration.

JD arrived in the area of the facility at approximately 11:30AM and departed at 12:45PM. No odors or excess opacity was observed during the time before, during, or after the inspection. Mr. Menno Klimek, owner, provided pertinent information regarding the facility and the operations contained therein during the time of the inspection. Mr. Erik Klimek, President, provided operational information after the inspection via telephone and e-mail.

Expert Coating manufactures coats and cleans plating racks made out of various metals. The manufacturing process includes metal grinding, cutting, and other metal working activities which are exempt from Rule 201 permitting requirements under Rule 285(l)(vi).

The coating and cleaning process include a polyvinyl chloride (PVC) dip tank coating operation, a bake oven and dry oven for the polyvinyl chloride coating, as well as burn-off oven to clean the racks once the plating company is done with them. The coating tank was not operating at the time of the inspection but the burn-off oven was operational. The temperature of the afterburner according to the digital readout was 1200°F.

Based on the amount of coating used at the facility, the dip tank and cure oven appear to be exempt from Rule 201 permitting requirements under Rule 287c with coating usage being less than 200 gallons per month. Purchase records are currently the only indication of coating usage. Going forward the facility will be keeping records of usage for the tank.

PERMIT NO. 317-74

This permit covers an afterburner for plastisol fumes.

The special conditions from the permit are detailed below:

9. Visible emissions from the strip and bake ovens shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a).

No visible emissions were observed before, during, or after the inspection.

10. Approval of this application does not preclude the applicant from complying with any future volatile organic compound regulations that may be promulgated under Act 348, P.A. 1965, as amended.

This is understood.

PERMIT ISSUES

The permit Expert Coating currently has is not satisfactory for the ongoing operations. Permit 317-74 only covers the afterburner on the rack-burnoff oven. In the time since the permit was issued several

changes have been made to the unit that may have triggered the need for a new permit. These changes include, raising the stack, getting a new burn-off oven, running at a temperature not listed in the permit application.

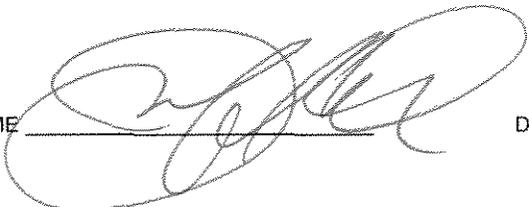
HCI Discussion

Based on the physical inspection, the company appears to be in compliance with state rules and regulations and PTI 17-74 at this time. However, PTI 317-74 does not restrict the emissions of HCI from the burning off of PVC in the burn off oven, therefore JD requested that Mr. Klimek submit a Potential to Emit (PTE) demonstration for the HCI from the burn-off process.

Mr. Klimek and JD discussed the need to provide the PTE during a phone conversation on June 2, 2014. This telephone call was followed up with an email detailed the request for a PTE. It is likely that the emissions of HCI will be above the major source threshold for emissions from a single hazardous air pollutant (HAP). If this is the case, the facility will be required to apply for a permit modification in order to ensure that operational and/or material limits are in place that will keep actual emissions from exceeding the HAP major source limit. Based on current operations at the facility, the actual emissions are most likely much lower than those that will be indicated by the PTE.

CONCLUSION

The facility is considered in compliance with Permit No. 317-74. JD will continue to follow-up on the progress of the PTE demonstration and the new permit application. A report will be completed at a later date to detail Expert Coating's progress.

NAME  DATE 6/4/14 SUPERVISOR PAB