

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

B171339424

FACILITY: American Seating Company	SRN / ID: B1713
LOCATION: 401 American Seating Center, NW, GRAND RAPIDS	DISTRICT: Grand Rapids
CITY: GRAND RAPIDS	COUNTY: KENT
CONTACT: Kyle GeBraad , Environmental Health and Safety Specialist	ACTIVITY DATE: 03/28/2017
STAFF: Adam Shaffer	COMPLIANCE STATUS: Non Compliance
SUBJECT: Scheduled unannounced inspection.	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

Air Quality Division (AQD) staff Adam Shaffer (AS), Kaitlyn DeVries (KD), and Heidi Hollenbach (HH) arrived at the facility the morning of March 28, 2017 to conduct an unannounced, scheduled inspection. The purpose of this inspection was to determine compliance with applicable air quality rules and regulations.

Prior to entering the facility, odor and visible emission observations were completed for the north plant. Following the facility walk through, odor and visible emission observations were completed for the west plant. No visible emissions or odors were identified offsite for the north and west plant. AQD staff met with Mr. Kyle GeBraad, Environmental Health and Safety Specialist, and Mr. Gary Kozak, Facilities Manager. The purpose of the inspection was briefly discussed with Mr. GeBraad, and included a facility walk through, with a final discussion at the end of the facility inspection.

Facility Description

American Seating Company (ASC) is a manufacturer of transportation and office/architectural seating products. The facility is in operation under an Opt-Out Permit to Install (PTI) No. 202-01. The layout of the site consisted of a corporate building, which was made up of various offices, a north plant and a west plant. All shipments of parts, prior to construction, are received at the north plant. All metal fabrication, welding, paint/powder coating and assembly of architectural / office seating products are completed at the north plant. All transportation products, once assembled at the north plant, are shipped to the west plant to be completed. While speaking with Mr. GeBraad, it was brought to AQD staff's attention that a portion of the north plant structure had been removed in 2016, with equipment previously located in that area having been relocated to different portions of the plant or removed off site. Additionally, ASC in the future plans to combine all three structures, and expand the north plant. All equipment would be relocated to the north plant. Since the equipment is being relocated to a different portion of the site, ASC may need to submit a PTI application per Rule 201(1).

Compliance Evaluation

The Opt-Out Permit No. 202-01 consists of three flexible groups, which are FGISADHESIVES, FGBURNOFFOVENS, and FGFACILITY. Additionally, several processes/equipment were observed throughout the facility that may potentially be exempt. The three flexible groups and potentially exempt equipment are discussed further below.

FGISADHESIVES

The Flex Group, FGISADHESIVE, is made up of approximately six booths (EUBOOTH1, EUBOOTH2, EUBOOTH3A, EUBOOTH3B, EUBOOTH5, and EUBOOTH7). During the inspection EUBOOTH2, EUBOOTH3A, and EUBOOTH5 were located in the north plant, and EUBOOTH7 and EUBOOTH3B were observed in the west plant. The 2013 inspection noted that EUBOOTH1 had been removed off site, and this was verified with ASC staff. Descriptions of each specific booth on site are as follows:

- EUBOOTH2 – This is an enclosed automatic dry filter application booth with two automatic spray guys, one manual spray gun, and one stack venting externally. This booth is used for the adhesive application for metal pre-fabricated panels.
- EUBOOTH3A – This is an open faced manual application dry filter booth with a manual spray gun, and one stack venting externally. This booth is used for adhesive application for small metal parts.
- EUBOOTH3B – This is an open faced manual application dry filter booth and manual and/or automatic spray guns. The booth was originally located in the north plant; however, it was relocated to the west plant and recommenced operations by 2015. This booth is used for adhesive application for small metal parts and foam back seating.
- EUBOOTH5 – This is an open faced manual dry filter application booth with a manual spray gun, small flash off curing oven, and two stacks observed venting externally. This booth is used for adhesive application to foam and metal substrates for auditorium products.
- EUBOOTH7 – This is an open faced manual dry filter application booth with a manual spray gun and one stack

observed venting externally. This booth is used for adhesive application to wood, fabric, foam and/or metal substrates for mass transit seating products.

All waste and/or product containers observed for each booth appeared to be properly closed, stored, and disposed of per state and federal regulations at the time of the inspection. Several booth filters were observed with air gaps and/or caked with coating materials. The filter conditions were discussed with ASC staff. Following the inspection Mr. GeBraad informed AQD staff, via email, that the filters were placed on a maintenance schedule to be replaced. Additionally, Mr. Kozak stated during the inspection that used filters were properly disposed of to Waste Management.

Stacks were observed venting externally from EUBOOTH2, EUBOOTH3A, EUBOOTH5 and EUBOOTH7. Though each stack was not measured, it appeared the dimensions were consistent compared to the PTI-No.202-01 dimensions listed. EUBOOTH3B was observed with no stack and was venting internally to the west plant.

The volatile organic compound (VOC) emissions for FGISADHESIVES are limited to 17 tons per year (tpy) based on a 12-month rolling time period. Additionally, coatings applied in FGISADHESIVES are subject to a VOC content limit of 5.45 lbs/gal (minus water) as applied. Records were provided to AQD staff by Mr. GeBraad following the inspection. Additionally, Material Safety Data Sheets (MSDS) for all coating materials used were provided, with the exception of one coating material (Simafila 321), in which technical data sheets were provided. A phone conversation between AQD staff AS and ASC staff Mr. GeBraad on 04/10/17 concluded that ASC is using Material Safety Data Sheets (MSDS) and/or calculations used in the past (unknown if the most current) to complete the majority of ASC's records. AQD is therefore unable to determine if ASC is in compliance with emission limits listed for FGISADHESIVES. Per special condition (SC) 1.6, the VOC content of each adhesive coating, as applied and received, shall be determined utilizing federal Reference Test Method 24, and upon written approval by the AQD District Supervisor, formulation data sheets may be utilized to determine VOC content. The VOC content and total emissions couldn't be verified. Therefore, this is a violation of SC.1.6 and 1.8.b-d. The remaining records for FGISADHESIVES did not include EUBOOTH3A to verify the booth was not in operation. Therefore, ASC is not properly keeping track of total amounts of each adhesive coating material used, and is a violation of SC.1.8a. The hours of operation for each booth were not available, and therefore, is a violation of SC.1.8.e.

No purge or clean-up solvents were stated by Mr. GeBraad to have been utilized for all booths on site for quite some time. When questioned how each spray line is cleaned, it was determined that ASC uses Icy Blast, purchased from Airgas, as a solvent free way for cleaning lines. An MSDS was received for Icy Blast and verified to have no VOC content.

The acetone emissions for FGISADHESIVES are limited to 10 tpy, based on a 12-month rolling time period. Reviewing records provided, acetone content for each coating material used was identified. However, EUBOOTH3A was not included to verify this booth was not in operation. Therefore, ASC is not properly keeping track of total amounts for acetone containing material used, and is a violation of SC.1.10a. Acetone emissions are considered incomplete, and a violation of SC.1.10.d-e. Records appear to show no reclaim is accounted for acetone containing materials used; though this was requested, but never verified by ASC staff.

The New Source Performance Standards (NSPS) Part 60, Subpart EE for Surface Coating of Metal Furniture was reviewed to determine if it is applicable to the ASC adhesive coating booths on site. The United States EPA on 09/13/1988, via a letter, concluded that adhesive coatings are not considered surface coatings under Subpart EE. Therefore, this standard does not apply to ASC.

FGBURNOFFOVENS

The Flex Group FGBURNOFFOVENS consist of two gas fired pyrolysis furnaces with a direct flame afterburner (EUBURNOFF#1 and EUBURNOFF#2). Both furnaces had been removed at the time of the inspection. The furnaces formerly had been used to burn off powder coated paint from wire part hangers and hooks. During the inspection, Mr. GeBraad stated the wire part hangers and hooks are now sent off site for the coating to be burned off.

EXEMPTIONS

During the inspection of American Seating Company, emission units were observed that could potentially be considered exempt. These units identified are listed below.

- One 17 MmBTU/hr natural gas only boiler was observed in the north plant. The boiler was installed on 01/01/1989, and therefore, not subject to New Source Performance Standards (NSPS) and appears exempt per Rule 282(2)(i).
- During the inspection several saws, horizontal metal benders, and presses were observed in the north plant. Emissions are released internally to the plant and appear to be exempt per Rule 285(2)(l)(i) or Rule 285(2)(l)(vi)(B).
- Welding stations were observed in the north and west plant, which appear to be exempt per Rule 285(2)(i).
- Approximately three bowl machines that polish/deburr parts were observed and appear to be exempt per Rule 285(2)(l)(vi)(B).

complete the majority of ASC's records. Therefore, ASC was unable to demonstrate compliance with VOC/HAP emission limits for FGFACILITY.

VOC's for FGFACILITY are limited to 30 tpy based on a 12-month rolling time period. Additionally, FGFACILITY is limited to less than 9.0 tpy for each individual hazardous air pollutant (HAP) per 12-month rolling time period and less than 22.5 tpy of aggregate HAPs per 12-month rolling time period. Records provided for FGFACILITY by Mr. GeBraad included data from FGISADHESIVES and EUBOOTH8. Per SC.3.2, Test Method 24 and/or formulation data sheets must be utilized to determine VOC content. Also per SC.3.3, Test Method 31 and/or formulation data sheets must be utilized to determine HAP content.

The correct VOC/HAP content and total emissions cannot be verified, and is a violation of SC.3.2, 3.3, 3.5.b-d, and 3.7.c-e. The records of each adhesive coating material in gallons (with water) are incomplete, and therefore, a violation of SC.3.5.a. The hours of operation are not being recorded, and therefore, is a violation of SC.3.5.e. As stated by Mr. GeBraad, no purge or clean-up solvents are used on site, and instead Icy Blast is used to clean spray lines. During the facility walk through of the north and west plant, several possibly exempt units were observed that potentially have emissions. Per SC.3.7.a, gallons or pounds of each material used must be recorded in order to verify ASC is maintaining compliance with FGFACILITY emission limits. No records were available for these units, and therefore, is a violation of SC.3.7.a. Records appear to show no reclaim is accounted for any materials used; though this was requested, but never verified by ASC staff.

Other Observations

A zirconium wash machine, which is part of the powder coating assembly line for the metal parts was observed in the north plant. Associated with the wash system are six tanks filled with zirconium, phosphate, deionized water and/or water. One stack was observed venting externally. Additional information will need to be provided by American Seating Company in the response to the Letter of Violation (LOV) to determine if this piece of equipment is potentially exempt.

Conclusion

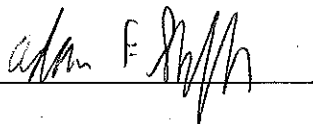
A final discussion was completed with AQD staff and Mr. GeBraad. Based on the review of the records provided and the facility walk through, American Seating Company is not in compliance with Opt Out PTI No. 202-01. A violation notice will be sent.

Recommendations

The following are items identified during the inspection and/or reviewing records that, though are not violations, will need to be completed.

The baghouse magnehelic will need to be fixed and the PM piles observed are to be removed. ASC will have the magnehelic fixed and PM piles removed when they submit their response for the LOV.

NAME



DATE

04/28/17

SUPERVISOR



- Three powder coating booths (powder coat spray to waste booth, powder coat reclaim booth, and a powder coating batch booth) were observed in the north plant. Each booth was equipped with automatic and/or manual spray lines. The filters appeared to be in good condition, and Mr. Kozak stated filters are changed twice a year. Mr. GeBraad later stated that they bring in an outside contractor (Seemans) to inspect and replace filters for the powder coating area. The powder coating booths appear to be exempt per Rule 287(2)(d).
- A drying oven and a multi stage bake/cure oven were observed as part of the powder coating assembly line in the north plant. The ovens appear to be exempt per Rule 287(2)(d).
- One cold cleaner was observed in the north plant. The cold cleaner was closed at the time of the inspection and unlabeled. Mr. Kozak stated that maintenance for the cold cleaner is completed by Crystal Clean. A QD staff provided a cold cleaner label to ASC staff. The cold cleaner appears to be exempt per Rule 281(2)(h).
- The Department 11 area is utilized by the ASC for miscellaneous operations and consists of one open faced booth. One stack was observed venting externally for the booth. Paints are manually applied to parts in this booth. Mr. Kozak stated that the filter was not working properly at the time of the inspection. Open containers were observed in the booth and a strong paint odor was noted. A QD staff informed ASC staff that all containers should be properly sealed to prevent fugitive emissions and the filter should be utilized during operations. The booth could be exempt per Rule 287(2)(c); however, no coating usage records were available.
- One open faced booth identified as EUBOOTH8 was observed in the north plant. No stack was associated with this booth and was observed to vent internally. Monthly total coating usage records were provided and reviewed back to January 2016. The monthly total coating usage records for this piece of equipment were below the 200 gallon limit. Based on this, the unit appears to be exempt per Rule 287(2)(c).
- A Gerber Automatic fabric cutting machine with a compactor was observed in the west plant and appears exempt per Rule 285(2)(l)(vi)(B).
- Various saws, CNC machines, and a pre rougher machine for wood working purposes were observed in the west plant. Fume hoods were observed above each piece of equipment. The fume hoods were connected to the one baghouse located on site or a dust devil machine that vented internally. These units appear to be exempt per Rule 285(2)(l)(vi)(B) or (C).
- A baghouse was observed in the west plant to capture particulate matter (PM) emitted from wood working equipment onsite. The (PM) collected from the baghouse is placed in an adjacent storage container that is shipped off site once a year. The magnehelic for the pressure drop was broken at the time of the inspection, and PM piles were observed around the baghouse. The magnehelic and PM piles around the baghouse will need to be fixed and removed respectively. A QD staff will follow up with ASC staff on the completion of these items. Several requests were made for ASC to provide the baghouse size. A response was never provided to A QD. The baghouse appears to be exempt per Rule 285(2)(l)(vi)(C).
- One edge bander machine was observed in the wood working area. During operation, glue is rolled onto wood parts. The glue machine could be exempt per Rule 287(2)(a); however, no records were provided when requested.
- A fiberglass machining area was observed in the west plant and all associated equipment appears to be exempt per Rule 285(2)(l)(vi)(B).
- A thermoforming plastics area was observed in the west plant and all associated equipment appears to be exempt per Rule 286(2)(d).
- An enclosed area for prison chair coating operations completed by ASC was observed in the west plant. Mr. Kozak stated that this area is used roughly every three months. A stack was observed for the prison chair area venting externally. This area could be exempt per Rule 287(2)(c); however, no coating usage records were available.
- An insert area was observed in the west plant where hot melt adhesive is applied. One automatic roller and two hand rollers were observed in this area. The insert area appeared to be exempt per Rule 287(2)(i).
- A turret machine used for buffing/polishing was observed in the west plant and appeared to be exempt per Rule 285(2)(l)(vi)(B).

FGFACILITY

The FGFACILITY covers all equipment throughout the facility including equipment previously mentioned in other Flex Groups, grandfathered equipment, and several exempt units.

As stated previously, ASC is using MSDS and/or calculations used in the past (that are unknown if the most current) to