

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

B171354891

<b>FACILITY:</b> American Seating Company		<b>SRN / ID:</b> B1713
<b>LOCATION:</b> 401 American Seating Center, NW, GRAND RAPIDS		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> GRAND RAPIDS		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Katie Hull , Sr. Human Resource Generalist		<b>ACTIVITY DATE:</b> 09/01/2020
<b>STAFF:</b> Adam Shaffer	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled unannounced inspection.		
<b>RESOLVED COMPLAINTS:</b>		

An inspection was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) for American Seating Company (ASC) on September 1, 2020 to verify compliance with Consent Order (CO) No. AQD2019-14 and applicable air pollution control rules.

### Facility Description

ASC is a manufacturer of transportation and office / architecture seating products. The facility is a true minor source of criteria pollutants and utilizes exemptions to operate all processes / equipment onsite.

### Offsite Compliance Evaluation

Per CO No. AQD2019-14, ASC is required to submit monthly usage reports verifying the two coating booths remaining at the time the CO went into effect are in compliance with Rule 287 (2)(c). ASC has since then been submitting monthly reports, and with the exception of the first report submitted late, all reports had been submitted on time and appear to show the two booths are exempt per Rule 287(2)(c). In the August 2020, monthly report received by the AQD, ASC has installed and commenced operation of a third coating booth on June 29, 2020. The monthly report with records for July 2020 included the usage rates for the new booth and based on the usages the booth appeared to be exempt per Rule 287(2)(c). No usages were reported in June 2020 for the new booth despite it commencing operation at the end of June. After further discussion with ASC staff it was concluded that any potential usages for that booth at the end of June would have been minor to verify the unit would operate properly. This was determined to be acceptable.

Following the site inspection, it was determined that there was a reporting error in the usages for EUBOOTH7. Monthly usage reports submitted indicated that the booth had ceased operation since October 2019. Speaking with ASC staff this was incorrect, and the unit had been in operation. Total usages since October 2019 were 36 gallons, which still indicate the unit would appear to be exempt per Rule 287(2)(c). Moving forward the most recent report submitted (August 2020 Usage Report) will be resubmitted and identify the correct usages for EUBOOTH7 back to October 2019. Additionally, it was discussed with ASC staff that per CO No. AQD2019-14, monthly usage reports submitted must properly indicate the usages for each booth in order to demonstrate compliance.

### Compliance Evaluation

Prior to inspecting the facility, AQD staff AS had contacted Ms. Katie Hull, Senior Human Resource Generalist, to verify that there would be no issues for an inspection due to the coronavirus pandemic. No issues were identified. Appropriate personal protective equipment (PPE) was worn by AS while onsite and social distancing was maintained when possible.

AS arrived in the area of the site at 12:45pm. Before entering the facility, offsite odor and

visible emission observations were completed. It should be noted that operations have condensed from the last inspection and the west plant is no longer part of the facility. Weather conditions at the time of the inspection were cloudy skies, temperatures in the high 70's°F, and winds from the west at 0-5 mph. A diesel odor was noted to the east of the site and a damp water odor to the north of the site. No odor complaints have been received recently regarding ASC. Upon entering the site, the necessary items were completed due to the coronavirus pandemic to gain access to the site. AQD staff AS met with Ms. Hull who provided a tour of the facility and answered site specific questions related to the facility. Mr. Gary Kozak, Representative of ASC, was present at the end of the inspection to discuss the findings and answer any remaining questions.

### **Additional Observations**

- The three paint booths were observed during the course of the inspection. Additional details for each booth are discussed further below.
  - o EUBOOTH7 – This paint booth utilizes only the Simalfa glue material. This paint booth uses manual spray nozzles for application. The paint booth vents internally. Filters are changed daily for this booth. Minor air gaps were observed in the filters in place. It was discussed and moving forward the air gaps shall be limited in order to maintain satisfactory operation of the unit.
  - o EUBOOTH3B – This paint booth utilizes the 3M Fastbond materials. This paint booth uses manual spray nozzles for application. The paint booth vents internally. Filters are changed daily for this booth. Minor air gaps were observed in the filters in place. It was discussed with ASC staff and moving forward the air gaps shall be limited in order to maintain satisfactory operation of the unit.
  - o New Booth – The new booth was observed during the inspection. The paint booth uses manual spray nozzles for application. The paint booth vents internally, and filters observed appeared acceptable with no air gaps noted.

Based on the onsite observations and review of the monthly records provided, the three paint booths appear to be exempt per Rule 287(2)(c).

- Two powder coating lines with an associated drying oven, cure oven, and wash system were noted during the inspection. The powder coating operations utilize a mixture of manual and automatic spray application nozzles. The particulate filtration system for waste powder coat vents internally. The two powder coating lines and associated ovens / washing system appear to be exempt per Rule 287(2)(d).
- Two plastic thermoforming units were observed during the inspection that appear to be exempt per Rule 286(2)(d).
- One parts washer was observed during the inspection. A label was observed on the unit and it was closed. The parts washer appears to be exempt per Rule 281(2)(h).
- Three hot melt adhesive units were observed during the inspection that appear to be exempt per Rule 287(2)(i).
- One 17 MMBTU/hr natural gas fired boiler was observed during the inspection. Previous records indicate that the unit was installed on January 1, 1989 and not subject to New Source Performance Standards Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The boiler appears to be exempt per Rule 282(2)(b)(i).
- Welding stations were noted that appear to be exempt per Rule 285(2)(i).
- Large numbers of metal and plastic fabrication operations were observed such as

cutting, bending, sanding, and polishing / deburring. All operations observed were noted to vent inside. Additionally, select units would utilize a fabric filter collection system that would vent internally. Based on the observations made, the various operations noted above appear to be exempt per Rule 285(2)(l)(vi)(B).

- Prior to completion of the site inspection, a review of the AQD permit database identified one permit still active. Permit to Install (PTI) No. 277-70 was from the 1970's and mentions it is for a grinding room dust control vent – schneible model F31C 14,800 cfm wet scrubber. During the site inspection this equipment was not observed, and Mr. Kozak stated that the equipment had been dismantled and in storage. It was discussed and determined the permit shall be voided.

### **Conclusion**

Based on an inspection of the facility and records reviewed, ASC appears to be in compliance with CO No. AQD2019-14 and applicable air pollution control rules.

NAME Adam Shaffer

DATE 09/25/2020

SUPERVISOR HH