

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

B661929855

FACILITY: Tiara Yachts Division of S2 Yachts		SRN / ID: B6619
LOCATION: 725 E. 40th St., HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Todd Grammatico, Employee Safety & Wellness Coordinator		ACTIVITY DATE: 06/17/2015
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. The inspection brochure was handed out. For Tiara Yachts Todd Grammatico, Bill Meyers, and Jeff Pfof of Environmental Partners were present. The plant operates 2 shifts per day, 10 hours per day, and 4 days per week.

The inspection began with a walk through. The Energetx component has closed its manufacturing operations. An ROP modification request should be submitted to remove EUBLADEPAINT-1 and EUBLADEPAINT-2 from the ROP if appropriate. The equipment is in the process of being moved out. Currently about two boats are being built per week. This is being done in the new part of the facility. Manufacturing was not being done in the older part of the facility that was divided into booths or in the upstairs area.

There is a welding and fabrication area. This is exempt by Rule 285(i). EUHULLDECKGRINDING is a large grinding and sanding booth that can be divided into three separate areas. Emissions are vented internally.

There is a closed molding area for small parts. Vacuum is used to evacuate air, then resin is infused. Vacuum is not used after the infusion of resin. Excess resin is captured. Hulls and decks are mostly open molded. Molds are cleaned, sealed, and then a mold release is applied (Axel 818) before gel coat is applied. VOC's are tracked in the FGMOLDINGEMISSIONS flexible group. They are using an adhesive that contains MMA. This is used to connect the hulls with the decks. During the inspection resin and fiberglass were being applied to a deck.

They are currently using one resin bulk tank. The amount used is monitored daily. Resin is pumped to drop stations where it is put in drums. Air assisted non atomizing guns are used that mix internally resin and catalyst. Gel coat is used from drums. All drums appeared to be covered.

There is a fiber glass cutting area with 3 machines. Fiber glass is cut into various sizes to apply to boats. The cutting operations have dust collectors that are vented internally.

Acetone is the cleanup solvent. Acetone is shipped to the plant in drums. Used acetone is stored in a bulk tank to be hauled away. Fresh acetone is no longer stored in a bulk tank. Very little Acastrip is used.

The woodworking area has various equipment connected to the outside dust collector. The emissions are vented back inside the plant. No visible emissions were seen. Collected material is conveyed to a dumpster. The area around the dust collector was clean. Visible emission checks and pressure gage readings are done daily. The differential pressure gage was reading 1.0.

There are 3 booths that are Rule 287. These are EUNBOOTH, EULB2SOUTH, and EULB3SANDCOAT. Hull painting is done in EUNBOOTH. On the outside wall near these booths are two dust collectors used for housekeeping. These are exempt by Rule 281(a). Another Rule 287 booth is EUUHOLSTRYADH. This is upstairs outside the engineering area in the fabric area.

Boat assembly is done in the area outside of engineering. This is where the decks are put on the hulls and final assembly is done.

Molds are made in the engineering area. There are 2 booths for composites application and another booth with a CNC router.

According to the semi-annual compliance reports, the facility is in compliance with 40 CFR Part 63 Subpart WWWW. The flexible group FGMOLDINGEMISSIONS specifies recordkeeping for the molding operations, solvent usage, and Engineering. For molding operations, daily resin usage from the bulk tank is monitored. The facility is also required to calculate pounds of VOC per hour, day, and year. The facility is calculating these and is in compliance with the emission limits. The facility is now calculating pounds of VOC per hour and pounds of VOC per day based on each day of resin usage from the bulk tank. This appears to conform with what is required in the permit. Before these calculations were being done based on a monthly average. Records for solvent usage and for engineering indicated that the facility is in compliance with the emission limits.

There are 8 Rule 287 groups. These are EUUPHOLSTRYADH, EUNBOOTH, EUFAPAINTS, EUHULLPAINT, EULB2SOUTH, EULB3SANDCOAT, EUBLADEPAINT-1, and EUBLADEPAINT-2. The latter two emission units were for Energetx and are no longer used. Recordkeeping for the other emission units were complete.

There are two Rule 290 groups, EUFASEALANTS and EUFAWOODFINISH. These records were complete.

NAME Dennis Dumlup

DATE 6/25/15

SUPERVISOR MA 6/25/2015