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

FACILITY: SPECTRUM INDUSTRIES INC		SRN / ID: B7037
LOCATION: 700 WEALTHY SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Tim Braniff, Senior Vice President		ACTIVITY DATE: 06/27/2017
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, sche	eduled inspection.	
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Tim Braniff, Senior Vice President and Burt Thurston, Process Engineer. They were informed that this was a routine inspection to include a physical tour and to evaluate recordkeeping to determine compliance with permit limits.

FACILITY DESCRIPTION

Spectrum Industries, Inc. E-coat Division operates under two Permits to Install. One is 547-95A which covers a metal e-coat line and the other is 168-98 which covers a conveyorized burn-off oven. The existing natural gas fired boiler installed in 1996 is currently on standby because Spectrum Industries, Inc. has installed two 50 HP natural gas fired boilers as a replacement package. These are exempt per Rule 282(2)(b) and are not subject to New Source Performance Standard Dc due to size.

COMPLIANCE EVALUATION

The e-coat metal automotive parts coating line consists of a conveyorized 11 stage cleaning/pre-treat system and cathodic epoxy HAP-free paint dip application and associated dehydrator and cure oven. Spectrum continues to utilize the Powercron 590 and PPH in the e-coat line. PPH usage for 12-month rolling time period of May 2016-May 2017 was 1,128 gallons and below the limit of 1,500 gallons. Spectrum provided VOC recordkeeping (attached) that details VOC emissions for the 12-month rolling time period of May 2016 - April 2017. The reported VOC emissions were 13.26 tons and below the limit of 28.0 tons. Monthly emissions data was provided as well for review. The coating mix ratio is monitored daily, and the 1.0 lb/gal minus water as applied limit does not appear to be an issue because the VOC content of each constituent is only 0.19 lb/gal.

Spectrum currently does not utilize purge or clean-up solvents in the e-coat line. There have been no stack changes made.

The Blu-Surf conveyorized burn-off oven was observed. Racks go through a wash tank then into the oven and the epoxy e-coat is burned off through a two stage direct flame that is required to be maintained at $1,200^{\circ}F$ (+/- $50^{\circ}F$) averaged over a consecutive three hour period. The facility will be replacing the wash tank soon, and we discussed that replacement and upgrades of the unit cannot be above 50% of the cost of a new unit, or the AQD considers that equipment reconstructed and subject to new permit review. The temperature setpoint is $1,205^{\circ}F$, and the current chart appeared to

demonstrate compliance with the +/- 50° of 1,200°F on a three hour average. A review of three months of the weekly temperature strip charts indicates compliance with the average.

Staff did not observe any compliance issues during the physical inspection and related that to Mr. Braniff and Mr. Thurston during the closing conference. Mr. Thurston promptly e-mailed the required records for review.

We also discussed that I noticed a slight discrepancy in the 2016 MAERS. The AQD system has a function that compares current usage and emissions to the previous year. I noted that there was only a small increase in coating usage, but a 187% increase in emissions. I mentioned this to Spectrum who contacted their consultant to see what the situation was. It was learned that the consultant made an error when submitting the 2015 data. Since Spectrum is not a fee subject facility, it is not critical to correct. When the data is received from the consultant, it will be placed in the file.

CONCLUSION

The facility was in compliance at the time of the inspection.

DATE <u>7-6-1</u>7

SUPERVISOR