

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N122961140

FACILITY: PRS MANUFACTURING CO		SRN / ID: N1229
LOCATION: 3745 DYKSTRA DR, WALKER		DISTRICT: Grand Rapids
CITY: WALKER		COUNTY: KENT
CONTACT: Dennis Kowalczyk , Owner		ACTIVITY DATE: 11/04/2021
STAFF: Michael Cox	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Michael Cox (MTC) arrived at PRS Manufacturing Company (PRS) at 1:00 pm on November 4, 2021 to complete a scheduled, unannounced inspection.

Facility Description

Prior to entering the facility, offsite odor and visible emission observations were completed. No visible emissions were observed, and no significant odors were identified.

Upon arrival, AQD staff MTC initially met with Mr. Dennis Kowalczyk, Owner, who provided a walkthrough of the facility and answered onsite questions. PRS manufactures, coats and cleans plating racks made from various metals. The facility is in operation with Permit to Install (PTI) No. 915-85B. PRS is considered a Title V Opt-out source for Hazardous Air Pollutants (HAPs) due to taking limitations on batches processed through EU-STRIPOVEN to restrict hydrogen chloride (HCL) emissions. PRS is also operating with General PTI No. 127-18 for the facility's coating lines with a 10 ton per year (tpy) based on a 12-month rolling time period limit of volatile organic compound (VOC) emissions and is considered a minor source of VOCs. PRS was previously under Consent Order AQD 56-2014, which terminated on September 27, 2018 for operating without a permit. The facility does not appear to be subject to any additional federal regulations or standards at this time. No significant changes have been made to the facility's processes since the previous inspection on March 2, 2018.

During process operations, racks previously used for coating are received on site and coating materials are removed in the strip oven. Following the stripping of the coating materials, various procedures such as welding and sandblasting to the racks are completed. Following this the racks are dipped in a primer/solvent prior to being coated with polyvinyl chloride (PVC) and baked before shipped off site.

PTI No.915-85B

EU-STRIPOVEN:

EU-STRIPOVEN is a batch type natural gas-fired burn-off oven used for the removal of plastisol coatings from metal parts. The oven is equipped with a 1,200,000 BTU/hr afterburner control system.

EU-STRIPOVEN is limited to processing no more than 150 batches of metal parts per a 12-month rolling total. Records were requested for monthly totals, as well as 12-

month rolling totals for EU-STRIPOVEN, but were never received. PRS is in violation of Special Condition (SC) VI.5.

EU-STRIPOVEN was observed during the inspection. It was verified that the oven only burns natural gas and processes only cured paints, oil or grease on racks and/or hangers. The oven is installed with an LCD display screen for both the primary chamber and afterburner temperatures during operation. The oven was verified to be equipped with a circle chart recorder to continuously record temperatures for each oven's afterburner during operation with the strip ovens circle chart also recording the primary chamber temperature.

The strip oven was not in operation at the time of the inspection. The afterburner temperature observed on the chart recorder for the last burn was noted to be recorded as operating at approximately 1,450°F, which is over the minimum permitted temperature requirement of 1400°F. Circle chart records were requested back to November of 2020 to verify that proper operating temperature is maintained, however, PRS failed to submit the circle chart records upon request. This is a violation of Special Condition VI. 2.

Records were requested for all thermocouple calibrations and maintenance performed on EU-STIRPOVEN. The last calibration and maintenance check was conducted on October 22, 2021 by Industrial Service Solutions. A copy of the maintenance bill from Industrial Service Solutions was obtained on site and is attached to this report. PRS staff stated that no malfunctions have occurred during that time frame. Recommendations were made to PRS staff to keep better records of maintenance activities in the future. PRS staff stated that they will keep track of all maintenance, calibrations, and malfunctions in a more satisfactory manner.

Chemical compositions of the materials being processed in EU-STRIPOVEN was requested, however, PRS failed to submit the requested records. It appears that PRS is not keeping adequate records of the chemical composition of the material being process and is in violation of Special Condition VI.4.

One stack is listed in association with this emission unit. The stack appeared to be consistent with the dimensions listed in PTI No. 915-85B.

General PTI No. 127-18

FG-COATING:

This flexible group consists of any coating lines and associated equipment that meet the following criteria: One or more coating lines and all associated purge and clean-up operations, where each coating line is a single series in a coating process and is comprised of one or more coating applicators, any associate flash-off areas, drying areas, and ovens where one or more surface coatings are applied and subsequently dried or cured. Coating lines may be used to coat any substrate except cans, coils, large appliances, metal furniture, magnet wire, fabrics, paper, vinyl, flat wood paneling, or graphic arts lines.

FG-COATING is limited to 2,000 pounds per month lbs/month and 10 tons per year (tpy) VOC based on a 12-month rolling time period. A primer/coating dip tank and a PVC dip tank were observed during the site inspection that is used to prime the metal racks prior to being coated and baked with PVC. PRS staff stated that the primer dip

tank contains 19% primer and 81% methyl ethyl ketone (MEK). PRS staff stated that all materials coated in the primer dip tank go through the PVC dip tank. Based on this, the two dip tanks are considered to be one coating line. No stacks or control equipment are utilized for this coating operation. All purge/clean-up solvents and waste coatings were noted to be stored in closed containers. Per Special Condition V.1. PRS was to verify VOC emissions and VOC content of the coatings, reducers, or purge/clean-up solvents used in the coating operation using federal Reference Test Method 25A, Method 24, or other EPA approved methods. PRS could also obtain written approval by the Air Quality Division District Supervisor to use manufacturers' formulation data to determine VOC content of the materials used in the coating process. Test results were requested for the coating materials since no prior approval to use manufacturer's formulation data was granted. PRS failed to provide the required documentation and is found to be in violation of Special Condition V.1. Records of purchase orders and invoices for all coatings, reducers, and purge/clean-up solvents, as well as VOC content, and usage of each coating, reducer and purge/clean-up solvent were requested for the time period of November 2020 through October 2021, but were not submitted by PRS. Records of VOC mass emissions on a monthly and 12-month rolling basis were also requested for the time period of November 2020 through October 2021 and were never received by AQD staff. Due to the lack of records submittals by PRS, the facility is in violation of Special Condition VI.3(a-e). Material Safety Data Sheets (MSDS) and manufacturer's formulation data to determine the chemical composition of each coating was requested for the time period of November 2020 through October 2021 and were also not received by AQD staff. Due to this fact, PRS is in violation of Special Condition VI.4. During the site visit it was determined that no new coating operations were installed since the issuance of General PTI No.127-18.

FG-SOURCE:

This flexible group includes all coating lines and associated purge and clean-up operations at the facility. FG-SOURCE is limited to 30 tpy of VOC emissions per 12-month rolling time period. Records of VOC emissions per 12-rolling month time period was requested, specifically, for the time frame of November 2020 through October 2021. PRS failed to produce or submit these records to AQD staff and is found to be in violation of Special Condition VI.1.

Additional Observations

- Several drill press machines were observed that appear to be exempt per Rule 285(2)(l)(vi)(B).
- Welding and soldering areas were observed on site. Operations observed appear to be exempt per Rule 285(2)(i).
- A sandblasting area was observed on site that is used to sandblast burned racks. Fabric filters were observed in use. During operation, the adjacent door is kept open to maintain a negative pressure. The sandblasting area appears to be exempt per Rule 285(2)(l)(vi)(C).

Conclusion

Based on the lack of the records provided and the facility walk through, PRS is not in compliance with PTI No. 915-85B nor General PTI No. 127-18. A violation notice (VN) will be sent for the violations identified above.

NAME Michael T. Cox

DATE 12/15/2021

SUPERVISOR _____