

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

N214632549

FACILITY: West Michigan Molding, Inc.		SRN / ID: N2146
LOCATION: 1425 AERIAL VIEW DR, GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Kris Wagenmaker, Director of Production		ACTIVITY DATE: 12/03/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced scheduled inspection. No visible emissions or odors were identified off-site. I met with Kris Wagenmaker, Director of Production to whom I provided the DEQ Environmental Inspections: Rights and Responsibilities brochure to and discussed its contents.

FACILITY DESCRIPTION

The facility operates pursuant to Opt-out PTI No. 213-00E issued in September of 2014. The facility is a synthetic minor source of VOC and HAP, and is therefore not subject to any major source coating regulations. The facility is also "opting out" of Rule 632 by keeping emissions of each line below the 10 ton/2,000 lb per month limit. The facility is involved currently in the plastic injection business, and has seen an increased use in the coating line since the last inspection. Total amount of paint applied in 2010 was 6 gallons, now the facility is utilizing four of the six booths daily.

COMPLIANCE EVALUATION

No physical changes have been made to the facility since the last inspection. We discussed the use of HVLP guns or equivalent with Larry, Maintenance Supervisor. Larry specified that they are utilizing HVLP guns, and we discussed the definition of HVLP to mean that the pressure measured at the gun air cap shall not exceed ten pounds per psig. Larry indicated he would double check that is being done by purchasing a test cap.

FGSPRAYBOOTHS

Booths #1 and #7 were not in used during the inspection, and they were operating the other booths with one ad pro, one primer and two with top coat application. The booths are equipped with pressure drop gauges however they are not used. The single bank filters are changed once per shift. The coatings for the line are mixed on site, so in addition to data sheets for the black coating, I asked for the specific mix ratio of the coating as applied.

EMISSION LIMITS

VOC's are limited to 22.0 tons per 12- month rolling time period. Reported VOC emissions through October 2015 are 11.41 tons. Tripropylene glycol methyl ether is limited to 4.8 tons per 12-month rolling time period. Reported emissions are 0.0 tons. Napthalene is limited to 1.4 lb/day, and the highest daily emission in October was reported on the 28th at 0.97 lbs. P-Chlorobenzotrifluoride is limited to 33.6 lb/day, and the highest daily emission reported was also on the 28th at 23.82 lbs.

PROCESS/OPERATIONAL RESTRICTIONS

Staff did note to Ms. Wagonmaker and Larry that a container with solvent was present at one of the booths which was uncovered. It was covered during the inspection. No improper disposal methods of the filters was observed.

DESIGN/EQUIPMENT PARAMETERS

The filters were in good repair, and good overlapping placement. Larry was able to confirm the use of HVLP guns, and we discussed that any change away from HVLP to a newer technology should be evaluated before being done. The permittee did not have test caps available, but was able to procure some after the inspection.

TESTING/SAMPLING

The permittee has had approval to utilize formulation data to determine VOC content since June of 2001. However, the facility provided me with MSDS's that date from 2012, not formulation data. Through this report, it is recommended that the facility utilize formulation data sheets that are kept current. The most recent updates as identified on the Sherwin Williams website are as recent as 12/13/2015. The changes were minimal, but are why this information is required to be kept current.

MONITORING/RECORDKEEPING

As indicated above, it is recommended that the facility utilize more current data sheets, implement a system for review and also include keeping the most recent data sheet available upon request.

A comparison of the recordkeeping requirements with the records being maintained indicate that all requirements of this section are being met. Emissions of each pollutant limited through this permit have been detailed above.

REPORTING

NA

STACK/VENT RESTRICTIONS

The company has stated that there has been no change to the stack configuration at the facility.

FGFACILITY

FGFACILITY covers all process equipment source-wide at the facility and includes limitations on both HAP and VOC emissions as follows.

EMISSION LIMITS

Each individual HAP is limited to less than 9.0 tons per 12-month rolling time period. The highest reported HAP emission for the previous 12-month period ending in October is MIBK at 0.32 tons. The aggregate HAP emission is limited to less than 22.5 tons per 12-month rolling time period. Reported aggregate HAP emissions for the previous 12-month period ending in October is 0.76 tons. VOC emissions are limited to less than 30.0 tons per 12-month rolling time period. The reported VOC emissions for the previous 12-month period ending in October are 11.41 tons. Emissions of Cumene from the facility is limited to 0.4 tons per 12-month rolling time period. The reported emissions of cumene for the previous 12-month period ending in October are 0.07 tons. Emissions of naphthalene are limited to 0.4 tons per 12-month rolling time period. The reported emissions of naphthalene for the previous 12-month period ending in October are 0.06 tons.

MATERIAL LIMITS

NA

PROCESS/OPERATIONAL RESTRICTIONS

NA

DESIGN/EQUIPMENT PARAMETERS

NA

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SUMMARY

West Michigan Molding, Inc. was in compliance at the time of the inspection. See attached for data sheets and recordkeeping demonstrating compliance with Opt-out PTI No. 213-00E.

NAME



DATE

12-16-15

SUPERVISOR

PAB

