DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N258532396

| FACILITY: A & K Finishing, Inc. | | SRN / ID: N2585 |
|---|-------------------------------|---------------------------|
| LOCATION: 4175 DANVERS Ct. SE, KENTWOOD | | DISTRICT: Grand Rapids |
| CITY: KENTWOOD | | COUNTY: KENT |
| CONTACT: Scott Hankamp , Operations Manager | | ACTIVITY DATE: 12/04/2015 |
| STAFF: David Morgan | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: | | |
| RESOLVED COMPLAINTS: | | |

At 11:00 A.M. on December 5, 2015, Air Quality Division staff Dave Morgan conducted an unannounced scheduled inspection of A & K Finishing located at 4175 Danvers Ct. SE in Kentwood. The purpose of the investigation was to determine the facility's compliance with air use permit to install (PTI) No. 264-04A as well as state and federal air pollution regulations. Accompanying AQD staff on the inspection was Scott Hankamp, Operations Manager.

FACILITY DESCRIPTION

A&K Finishing paints plastic, interior automotive parts. This facility consists of six coatings booths. The company is considered a synthetic minor source for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs). This facility is currently operating one shift, four days per week. At the time of the inspection, the facility was not operating.

COMPLIANCE EVALUATION

PTI No. 264-04A, covers six coating spray booths. Booths 1 through 5 are manual spray coating booths. Booth 6 was converted to a robotic spray booth in 2009. A conveyor belt runs between all the booths and then through an oven. The booths typically spray different types of mask coating. All of these booths operate independently and each have mat filters which are changed once per day. Filters were installed.

In addition, the company is required to use HVLP guns. During the inspection, the company had Devilbiss Compact, Binks HVLP, and Binks LVMP spray guns. Booth 6 had a Sata LP90 HVLP robotic gun. All guns are HVLP compliant.

Since two component paints are used in these booths, the lines are purged with MEK solvent at breaks and equipment shutdown. All waste purge solvents and coatings were stored in closed containers and disposed in an acceptable manner.

All stacks were observed to be in compliance with applicable design requirements.

Recordkeeping:

According to company records, for the period from December 2014 through November 2015, emissions were as follows:

| Condition | Pollutant | Actual | Limit | Compliance |
|------------|--------------------------------|-------------------|----------------------------|------------|
| FGCOATING1 | VOC | 2.77 tons | 30.0 tons/12-month rolling | Y |
| FGCOATING2 | 2,4-Toluene Diisocyanate | 0.03 lbs | 0.02 tons/12-month rolling | Y |
| FGCOATING3 | Hydrodesulfurized heavy naptha | 0.08 lbs | 2.7 tons/12-month rolling | Y |
| FGCOATING4 | 2,4-Toluene Diisocyanate | <2.9E-4 tons/mnth | 0.04 lb/8-hr | Υ |
| | | | | |

| FGCOATING5 | Isobutyl Acetate | <14.09 lb/8-hr | 42.9 lb/8-hr | Υ |
|-------------|----------------------------|------------------|----------------------------|---|
| FGCOATING6 | Hexamethylene Diisocyanate | <0.0009 lbs/8-hr | 0.03 lb/8-hr | Υ |
| FGFACILITY1 | HAPs individual | <0.07 tons | 9.0 tons/12-month rolling | Y |
| FGFACILITY2 | HAPs total | 0.12 tons | 22.5 tons/12-month rolling | Y |
| FGFACILITY3 | voc | 2.77 tons | 30.0 tons/12-month rolling | Y |
| FGFACILITY4 | 2,4-Toluene Diisocyanate | 0.038 lbs | 0.03 tons/12-month rolling | Υ |

The company is using tert-butyl acetate as a thinner. Although it is not considered a regulated VOC, it should be reported to MAERS.

Records also include Method 24 analysis and coating technical data sheets.

It is noted that waste purge solvent containers needed lids in the booths. The purge solvent consists primarily of MEK.

SUMMARY

A&K Finishing appears to be in compliance with all applicable requirements. Company data obtained during the inspection has been recorded to CD and placed in the file.

DATE 12/15/15 SUPERVISO