

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

N355434084

FACILITY: RELIANCE FINISHING CO.		SRN / ID: N3554
LOCATION: 1236 JUDD ST. SW., GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Pat Cell		ACTIVITY DATE: 03/25/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Non 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 and met with Pat Cell. Mr. Cell was provided with a copy of the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed.

Reliance Finishing has historically consisted of three plants, but recently bought the adjacent building/address. The current stationary source consists of Plant 1-4.

FACILITY DESCRIPTION

Reliance Finishing is a wet coat and powder coating facility that manufactures parts for the automotive industry as well as other industries. The facility operates pursuant to General Permit to Install (PTI) 222-08 for 10 existing Coating Lines Emitting up to 10 tons per year of VOCs and PTI No. 306-96B for a burn-off oven and Opt-out conditions for HAPs. The compliance discussion will be on a per plant basis.

COMPLIANCE EVALUATION

Plant #1

Plant #1 is permitted per General PTI 222-08

This General PTI covers ten existing booths, all located in Plant #1. These are of various configuration/applicators which consist of either automatic electrostatic or manual HVLP. In a few booths, I mentioned to Mr. Cell that the filters were not in an acceptable position to capture solids. This was immediately addressed. During the inspection, it was determined that there were 11 booths present, not the 10 that are currently permitted in 222-08. This is a violation of the permit, however the facility submitted a permit modification prior to completion of the report so it will not be included in a Violation Notice (VN) at this time. The General Permit limits emissions of VOC from FG-COATING to 2,000 lb/month and 10 tons per year based on a 12-month rolling time period. Highest monthly emissions was recorded in August of 2015 at 1,146.37 lbs/VOC and the 12-month rolling average through February 2016 is reported at 6.24 tons VOC. These values indicate compliance with General PTI NO. 222-08. Also present at this plant was a large cold cleaner with acetone for soaking parts. The lid was down.

Plant #2

Plant #2 contains a powder coat line, a zinc phosphoric acid wash/pre-treatment line and the Ace burn-off oven contained in PTI No. 306-96B. The phosphoric acid tank is vented via a hood directly over the tank, and therefore is not able to utilize the Rule 285 exemption. The facility did not have calculations of emissions, and therefore asked FTC&H to prepare them. The information was submitted, and I ran the information by Jeff Rathbun, Senior Environmental Engineer with the AQD Permit Section in Lansing. Mr. Rathbun was in concurrence with the calculations.

We discussed the Ace burn-off oven, and Mr. Cell indicated that it is rarely used as a burn-off oven because of the volume of racks they utilize, they send them out to be cleaned. It is occasionally used as a bake oven as well. The oven was not in use at the time of the inspection, and Mr. Cell indicated it is serviced by Northwood's Industrial.

Plant #3

Plant #3 contains a powder coat line that utilizes all types of powdercoat materials. It consists of four booths, two with hand and two with automatic applicators.

Plant #4

Plant #4 was purchased approximately 3 years ago, and all the plastisol equipment that was previously permitted here has been recently removed and relocated in Wyoming, MI. A permit void request has been sent to Lansing. This plant conducts part preparation and shipping and packaging. A new powdercoat line is going to go in, which will use a zirconium wash as opposed to the phosphoric acid used in Plant #2.

Opt-out Permit 306-96B

This permit contains an emission unit for EUCLEANOVEN, for the Ace burn-off oven. It has a limit of 0.1 lbs/1,000 lbs exhaust gas, to be determined by a stack test. Stack testing is not recommended at this time. The stack dimensions were not verified at the time of the inspection, however Mr. Cell indicated no changes to the unit have been made.

FGFACILITY

This FG contains limits source-wide to serve as a HAP Opt-out permit, which requires emissions of individual HAP of less than 9.0 tons per 12-month rolling time period and aggregate HAP emissions less than 25.0 tons per 12-month rolling time period. Total HAP emissions are reported at 424 pounds for calendar year 2015. Aggregate HAP records were not available. Additionally, the facility has not maintained current listing from the manufacturer of the chemical composition of each material. For this reason, the information is not considered accurate. The facility will be cited in violation of not maintaining individual HAP emission calculations, determining the monthly emission rate of each in tons per calendar month. While it is likely that since total facility HAP emissions are less than 1 ton, aggregate HAP emissions are also very low. The circumstance is that this facility did not have the proper recordkeeping during the 2011 Full Compliance Evaluation, and was given the opportunity at that time to correct the deficiency without the citation of a violation. However, since the company has not corrected this deficiency, a violation will be cited. Facility records and additional information has been exchanged via phone conversations and e-mail with Mike and Mary Mosey, Owners.

SUMMARY

Reliance Finishing Company will be sent a Violation Notice for failure to maintain aggregate HAPs emissions records.

NAME Paul Lippard

DATE 4-25-16

SUPERVISOR PAB