

WBA

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

N368723614

FACILITY: ServiScreen, Inc.		SRN / ID: N3687
LOCATION: 0-1811 Chicago Drive, JENISON		DISTRICT: Grand Rapids
CITY: JENISON		COUNTY: OTTAWA
CONTACT: Jim Van Os, President		ACTIVITY DATE: 11/06/2013
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro, AQD and John Fischer, OWMRP arrived at the facility to conduct a joint unannounced, scheduled inspection. We met with Jim Van Os, Treasurer who was provided a copy of the DEQ Environmental Inspections: Rights and Responsibilities Brochure and its contents were discussed. Mr. Van Os provided Mr. Fischer with his file of manifests while staff talked to him about records. Mr. Van Os maintains all AQD records, and he pulled out a file. The last records printed were not recent; however it gave staff an idea of format. Mr. Van Os showed staff on his computer that records were maintained through July 2013 but he had to catch up some. Staff and he agreed that he would get me the past three months of records within 2 weeks.

FACILITY DESCRIPTION

Serviscreen is a facility that conducts various operations. These include piston coating, an I-coat process which takes place in two separate emission unit booths, screen printing, pad printing, digital printing and utilize six miscellaneous metal and plastic parts coating booths. The facility operates under Opt-out Permit to Install No. 133-04 which limits emissions of Hazardous Air Pollutants (HAPs) to less than 9.0 for individual HAP and 22.5 for aggregate HAPs.

We then went on a tour of the facility. Serviscreen employs approximately 90 employees who work 2-3 shifts. The areas containing the various printing equipment was observed to be well maintained. The equipment operates under exemptions listed under Rule 287.

The piston coating emission unit has historically operated under Rule 287(c). Basically, the facility gets in 'raw' pistons and coats them with a proprietary coating. It is then semi-cured, inspected and if passes inspection goes back in the oven for a full cure. The coating that is applied is internally vented. However the emission unit also uses large quantities of acetone and an alcohol based product for general clean-up and piston prep. Usage in gallons is well over 200 gallons per month and Rule 287(c) no longer applies. Additionally, emissions of regulated air contaminants, which include acetone, coating constituents and alcohol exceed the 1,000 pound per month threshold for Rule 290. Therefore, permit exemption Rule 290 does not apply. This emission unit appears to be in violation of Rule 201 and a Permit to Install (PTI) is required. A Violation Notice (VN) will be sent. Additionally, information will be provided to Mr. Van Os so that he may contact the Office of Environmental Assistance if he needs help preparing a permit application. Additionally Mr. Van Os indicated that they are going to be conducting some research and development to try and get rid of clean up solvent use all together. Instead they will try various soap and water type cleaners to do the same job. Mr. Van Os will likely respond to the VN with this as his compliance plan. This is acceptable, but the timeframe for R & D work is not to exceed 3 months. At that time, a decision should be made and/or a permit application should be submitted.

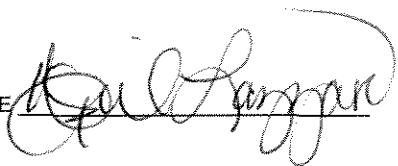
The I-coat operation currently operates two booths specifically installed for this process. Because they do not rely on each other to complete a finished part, they are considered two separate emission units. These emission units were previously determined to have zero emissions. However, while the actual coating process may be low in VOC (per previous AQD report) Serviscreen uses MEK in this process. The company has reported this as exempt per Rule 287(c) in the MAERS report. Usage in gallons is well over 200 gallons per month on a per booth basis. So Rule 287(c) no longer applies. However, based on reported emissions, the two emission units appear to fit within the Rule 290 exemption. Pursuant to a discussion with Mr. Van Os, the facility will begin to maintain records on a per booth basis.

The Paint department operates six paint booths that each operate per Rule 287(c), and are limited by the HAPs Opt-out limits. Usage is low enough that the company currently only maintains one set of records. It would be best if the company kept track of usage on a per-booth basis as has been requested by previous AQD inspectors.

HAPs emissions records are being maintained as required by PTI No. 133-04 and indicate compliance. The facility is limited to 22.5 tons aggregate HAPs per 12-month rolling time period. Current 12-month rolling emissions are 1 ton. Emissions of each individual HAP is limited to 9.0 tons. Highest single HAP usage is xylene with the highest rolling emissions of 154 pounds for a 12-month period.

SUMMARY

In summary, Serviscreen is in non-compliance at the time of the inspection.

NAME 

DATE 11-26-13 SUPERVISOR PARS