

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

N515525143

FACILITY: A & K FINISHING, INC. - PLANT 2		SRN / ID: N5155
LOCATION: 4436 DONKER COURT SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Scott Hankamp , Operations Manager		ACTIVITY DATE: 05/15/2014
STAFF: David Morgan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 8:30 A.M. on May 15, 2014, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of A&K Finishing Inc. - Plant 2 located at 4436 Donker Court SE in Kentwood. The purpose of the inspection was to verify compliance with Permit to Install No. 21-07B as well as state and federal air pollution regulations. Accompanying AQD staff was Scott Hankamp, the Operations Manager and Vickie Cook, Buyer who handles recordkeeping. A DEQ inspection brochure was presented at the inspection.

FACILITY DESCRIPTION

A&K Finishing paints plastic, interior automotive parts and some household products. The facility consists of six separate coating lines which are permitted under Permit to Install No. 21-07B which was recently issued in March, 2014. The company is considered a synthetic minor source for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs). The company is also subject to Rule 632, coating VOC content restrictions. The facility is currently operating one, eight to ten hour shift.

COMPLIANCE EVALUATION

The company has six coating lines. EULine 1 has three robotic paint booths and one infrared drying oven. EULine 2 has two robotic spray booths and one infrared oven. EULine3 has one robotic spray booth and infrared oven. EULine4 consists of two manual spray booths. EULine5 consists of three manual spray booths. EULine6 has one manual spray booth used to apply metallic coatings. The production on this line is anticipated to grow due to business needs and due to shifting production to meet VOC content requirements.

Paint is applied to plastic parts in all spray booths using HVLP guns in accordance with the permit. In addition the filters on all booths were maintained adequately.

The company uses gear pumps to accurately determine the amount of coating that is being pumped through the guns.

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

Recordkeeping:

According to company records, for the period from May 2013 through April 2014, the company had the following emissions:

Condition	Equipment	Pollutant	Limit	Actual	Compliance
FGCOAT, I.1	All coating lines	VOC	87.7 tons per 12-month rolling	14.47 tons	YES
FGCOAT, I.2	EU-LINE4 & EULINE6	VOC	10.0 tons per 12-month rolling	7.36 tons (Line 4) and 0.48 tons (Line 6)	YES
FGCOAT, I.3	EU-LINE4 & EULINE6	VOC	2,000 lbs/month	*<2,652 lbs in 8/2013	YES
FGCOAT, I.4	EU-LINE1, EU-LINE2, EU-LINE3 & EULINE5	VOC	5.0 lbs/gal minus water	** See Below	NO
FGCOAT, I.4	EU-LINE1, EU-LINE2, EU-LINE3 & EULINE5	VOC	5.75 lbs/gal minus water	***See Below	NO
FGFACILITY, I.1	FGFACILITY	HAPs individual	9.0 tons per 12-month rolling	<0.19 tons	YES
FGFACILITY, I.2	FGFACILITY	HAPs total	22.5 tons per 12-month rolling	<0.48 tons	YES
FGFACILITY, I.3	FGFACILITY	VOC	90.0 tons per 12-month rolling	<14.47 tons	YES
FGFACILITY, I.4	EU-LINE4 & EULINE6	VOC	30 tons per 12-month rolling	< 8.0 tons	YES

* The 2,000 lbs/month limit did not become applicable until PTI No. 21-07B was issued in March 2014. Therefore no violation exists since emissions from Lines 4 and 6 in April 2014 did not exceed 805 lbs/month.

**Based on company records, it was determined that the VOC content in lbs/gallon (minus water and exempt solvents) based on a daily weighted average exceeded the 5.0 lbs/gallon limit for non-red and black coatings on numerous occasions from July 2013 through April 2014. Non-compliance with the coating limit occurred approximately 67% of the operating time from July 2013 through April 2014.

***Based on company records, it was determined that the VOC content in lbs/gallon (minus water and exempt solvents) based on a daily weighted average exceeded the 5.75 lbs/gallon limit for red and black coatings on numerous occasions from July 2013 through April 2014. Non-compliance with the coating limit occurred approximately 22% of the operating time from July 2013 through April 2014.

These daily weighted average exceedances are in violation of FGCOAT Condition I.4. It is noted that despite exceeding daily VOC content requirements, overall emission from the facility are well below other applicable emission limits.

Company data has been recorded to CD and placed in the file. This record also includes Method 24 analysis conducted in 2014.

All waste purge solvents and coatings were stored in closed containers and disposed in an acceptable manner. The purge solvent consists primarily of MEK.

SUMMARY

A violation notice will be sent to A & K Finishing for the issues identified above.

NAME  DATE 6/2/14 SUPERVISOR PAB