

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

N515532394

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: 12/04/2015
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 10:15 A.M. on December 5, 2015, 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.

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 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 with a second shift being added.

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 Sata LP90, 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 November 2014 through December 2015, 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	24.69 tons	YES
FGCOAT, I.2	EU-LINE4 & EULINE6	VOC	10.0 tons per 12-month rolling	7.73 tons (Line 4) and 0.88 tons (Line 6)	YES
FGCOAT, I.3	EU-LINE4 & EULINE6	VOC	2,000 lbs/month	<1,699 lbs in 2/2015	YES
FGCOAT, I.4	EU-LINE1, EU-LINE2, EU-LINE3 & EULINE5	VOC	5.0 lbs/gal minus water	< 5.0 lbs/gal	YES
FGCOAT, I.4	EU-LINE1, EU-LINE2, EU-LINE3 & EULINE5	VOC	5.75 lbs/gal minus water	< 5.75 lbs/gal	*See Below
FGFACILITY, I.1	FGFACILITY	HAPs individual	9.0 tons per 12-month rolling	<1.29 tons	YES
FGFACILITY, I.2	FGFACILITY	HAPs total	22.5 tons per 12-month rolling	<1.82 tons	YES
FGFACILITY, I.3	FGFACILITY	VOC	90.0 tons per 12-month rolling	<24.69 tons	YES
FGFACILITY, I.4	EU-LINE4 & EULINE6	VOC	30 tons per 12-	< 8.61 tons	YES

\*Company records show the VOC content in lbs/gallon (minus water and exempt solvents) based on a daily weighted average was 7.50 lbs/gallon on November 11, 2015 one day in November 2015. However, the calculation in the record is in error and the lb/gallon value should actually be 4.35 lb/gallon which is in compliance with the 5.75 lbs/gallon limit for red and black coatings. The company will be advised to make corrections to the records.

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 (Plant 2) appears to be in compliance with all air pollution requirements. Records obtained during the inspection have been recorded to CD and placed in the file.

NAME



DATE

12/15/15

SUPERVISOR

PAB