

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

N533059972

<b>FACILITY:</b> THE GRIFFON INC		<b>SRN / ID:</b> N5330
<b>LOCATION:</b> 820 BROTON RD, MUSKEGON		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> MUSKEGON		<b>COUNTY:</b> MUSKEGON
<b>CONTACT:</b> Craig Zimmer , President		<b>ACTIVITY DATE:</b> 09/01/2021
<b>STAFF:</b> Scott Evans	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> On-site air quality compliance inspection.		
<b>RESOLVED COMPLAINTS:</b>		

### Introduction

On September 1, 2021, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division staff member Scott Evans (SE) conducted an air quality inspection of The Griffon facility located at 820 S Broton Rd. in Muskegon, Michigan, to assess compliance with Michigan's air quality regulations. This was an unannounced, on-site inspection

The Griffon is a manufacturer of large signs used in commercial settings. Operations include cutting and machining of signs, painting, and finishing. The facility is a minor source facility with one currently active permit to install (PTI): PTI No. 481-94A.

On the day of the inspection, SE arrived at the facility at approximately 11:30 am. Upon arrival there were no noticeable odors or visible emissions around the perimeter of the facility. After entering the facility, SE was greeted by multiple staff members. Larry Maki (LM) directed SE through the facility for a visual inspection while Lorraine Zimmer (LZ) and Craig Zimmer (CZ) assisted with records review after the visual inspection was complete.

### PTI No. 481-94A

PTI No. 481-94A is the only active permit at this facility. It was first approved in 1994 and modified in 2006. It encompasses one emission unit, EUDEGREASER, which is a batch vapor degreaser (Detrex Model #VS-800 electric-heated covered top) with a freeboard chiller system and no chlorinated solvents..

There is one emission limit and two material limits applied to this emission unit:

- 21 tons per year (tpy) of Volatile Organic Compounds (VOCs) for each 12-month rolling annual period.
- 3672 gallons of propyl bromide solvent per 12-month rolling annual period.
- Average of 1 gallon of solvent used per hour.

Records were provided to demonstrate compliance with these requirements. These records are discussed in detail further below.

The facility is required to follow all control requirements per Rule 708 outlined in Appendix A of the permit. During the inspection it could be seen that the degreaser was operating in accordance with these requirements.

The facility is required to keep the following records:

- Monthly and 12-Month Rolling annual records of solvent use.
- Degreaser operational hours.

- Average hourly solvent usage.
- Monthly and 12-Month Rolling annual records of VOC emission calculations.

The facility provided, upon request, the above records for the calendar years of 2020 and 2021. Below is a snapshot analysis of those records:

- Highest monthly usage of EnSolv (93% propyl bromide solvent solution) was 99.8 gallons used in June 2021.
- Highest 12-month usage of EnSolv (93% propyl bromide solvent solution) was 823 gallons from April 2019 through March 2020.
- Highest degreaser use was 188.9 hours of operation in January of 2020.
- Highest gallons per hour usage was 0.53 gallons per hour through November 2020.
- Highest monthly VOC emissions were 0.50 tons in June 2020.
- Highest 12-month VOC emissions were 4.37 tons from April 2019 through March 2020.

All records were complete and in acceptable formats for compliance with recordkeeping requirements. As demonstrated by the records, the facility was in compliance with all emission and material use limits discussed above.

The permit includes one stack, through which the emission unit is vented. The stack was not measured during the inspection, but visual assessment appeared to confirm that the stack was compliant with height and diameter requirements.

#### **Exempt Equipment**

The facility had multiple machining stations for cutting and shaping of the signs. This equipment is all vented internally or through a dust collector that also vents internally and so is exempt from permitting requirements by Rule 285(2)(l)(vi)(B). The Facility also has three welding stations. These stations are exempt from air permitting requirements by Rule 285(2)(i).

The facility has one spray booth used for painting and finishing signs. This booth is an entirely enclosed room with fabric filters installed. The filters were in good condition and appeared to have been recently changed at the time of the inspection. The facility provided records, which were reviewed on site, showing paint use for the calendar years of 2020 and 2021. The records showed that through the years of 2020 and 2021 paint usage did not reach or exceed 200 gallons for each month, with many months remaining below 100 gallons per month. This unit is exempt from air permitting requirements by Rule 287(2)(c) as paint use records are maintained and demonstrate usage to be below 200 gallons per month.

#### **Conclusion**

At the conclusion of the inspection the facility appeared to be compliant with the rules contained in PTI No. 481-94A and all other applicable air quality regulations.

NAME Scott Cana DATE 9/21/2021 SUPERVISOR HH