

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

N708247231

FACILITY: Coatings Plus		SRN / ID: N7082
LOCATION: 675 Chestnut SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Bob Rabe , Production Manager/Owner		ACTIVITY DATE: 12/11/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Coatings Plus, Inc. (CP) facility located in Grand Rapids, MI at 1:14pm on December 11, 2018 to complete a scheduled unannounced inspection.

Facility Description

Prior to entering the facility, off-site odors and visible emissions observations were completed. The weather conditions at the time of the inspection were winds from the west/northwest at 5-10mph, low 30's °F and cloudy skies. A slight paint odor was observed to the south of the facility. Emissions observed being vented from stacks noted appeared to be steam.

Upon arrival AQD staff AS met Mr. Bob Rabe, Production Manager/Owner, and Mr. Jeff Stegmeier, Owner. Both Mr. Rabe and Mr. Stegmeier provided a tour of the facility, answered site specific questions and supplied requested records. CP is a powder coating facility, mainly of various metal related products. The site currently operates two shifts a day. The site is listed in operation with permit to install (PTI) No. 44-08 for a burnoff oven.

PTI No. 44-08

EUBURNOFF

This emission unit is a batch type natural gas-fired burnoff oven equipped with an afterburner, used to remove cured parts, oil, and/or grease from metal parts by thermal decomposition in a primary chamber.

At the time of the inspection the burn-off oven has been offline for approximately three months. The associated stack with the oven had also been removed. The oven was observed in a storage area and clearly not in use. The company plans on moving the burnoff oven to a different portion of the building before restarting. A new stack will also have to be constructed. CP staff stated that currently parts are shipped offsite for burnoff. The submittal of a PTI application to modify PTI No. 44-08 to include a corrected stack height in order to restart the burnoff oven was discussed with the company on January 8, 2019.

Historically during operation, CP staff stated the burnoff oven used only natural gas and processed only powder coated parts. Automatic temperature control systems for the primary and secondary chamber and an interlock system were stated to be installed for the burnoff oven by CP staff.

Per Special Condition (SC) 1.10, CP shall calibrate the thermocouples associated with the primary and secondary chambers of EUBURNOFF at least once a year. Records were requested for all calibrations or replacements done for thermocouples associated with the primary and secondary chambers of EUBURNOFF since January 1, 2015. Based on the responses received, it appears that calibrations or replacements of the thermocouples associated with the primary and secondary chambers have not been completed since at least January 1, 2015. This is a violation of PTI No. 44-08, SC 1.10.

Per SC 1.11, CP shall keep temperature data records for the secondary chamber of EUBURNOFF. This is then used to demonstrate satisfactory operation of the EUBURNOFF. During the course of the inspection temperature data records were discussed at length and it was concluded that the most recent records taken were from 2014. The lack of records since then was due to a software issue. This is a violation of PTI No. 44-08, SC 1.11.

All maintenance records associated with EUBURNOFF were requested back to January 1, 2015. CP staff stated that no maintenance has been completed for EUBURNOFF for the past four years with the exception of the replacement of insulation in October 2017. This was concluded to be acceptable. Moving forward, it should be noted that per SC 1.12, records of date, duration, and description of any malfunction of the control equipment, any maintenance performed, and any testing results related to EUBURNOFF shall be kept in a satisfactory manner.

CP staff stated that all materials processed in EUBURNOFF are from their powder coating operations located onsite. CP utilizes various different powder coating materials based on the current consumer demand. Powder coating material storage areas were observed during the course of the inspection. A copy of a Safety Data Sheet (SDS) that accounts for a large portion of the material used was requested and promptly provided. It was concluded that CP is keeping track of materials burned in EUBURNOFF.

As stated previously, the one stack associated with PTI No. 44-08 has been removed.

Additional Observations

- Two powder coating booths and associated cure ovens were observed during the course of the site inspection. One coating booth is a batch paint booth and the other is a conveyor paint booth. Several ovens associated with both booths were observed. The batch paint booth has one manual operated spray nozzle and the conveyor paint booth has two manual operated spray nozzles. Each paint booth has a set of cartridge filters and a set of secondary filters. Additionally, the cartridge filters have a pulse cleaning operation. The filters are changed at least once a year or more if needed. The conveyor paint booth vents internally. The filters observed appeared to be in satisfactory condition. The two powder coating booths and associated ovens appeared to be exempt per Rule 287(2)(d).
- A 5-stage washer was observed during the site inspection that is associated with the conveyor paint booth. Iron phosphate and water are the only materials used in the washing system. Several stacks were observed venting externally, however, these were not for the iron phosphate stage of the wash.

Conclusion

Based on the review of the records provided and the facility walk through, CP is not in compliance with PTI No. 44-08. A violation notice (VN) will be sent for the following violations.

- Temperature data records have not been recorded for the secondary chamber for EUBURNOFF since at least January 1, 2015. Satisfactory operation of EUBURNOFF, therefore, also could not be verified. Based on this it is a violation of PTI No. 44-08, SC 1.11.
- Responses to maintenance record requests indicate that the thermocouples have not been calibrated for the associated primary and secondary chambers since at least January 1, 2015. This is a violation of PTI No. 44-08, SC 1.10.

NAME

Adam F. Shreff

DATE

01/09/19

SUPERVISOR

