

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

P060570032

FACILITY: Premier Finishing, Inc.		SRN / ID: P0605
LOCATION: 3682 Northridge Avenue NW, Suite 10, WALKER		DISTRICT: Grand Rapids
CITY: WALKER		COUNTY: KENT
CONTACT: Andy Ribbens , President		ACTIVITY DATE: 11/21/2023
STAFF: Dillon King	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Dillon King (DK) and Chris Robinson (CR) arrived at the Premier Finishing (SRN P0605), Inc. facility located in Walker, MI at approximately 10:00 am on November 21, 2023, to complete a scheduled unannounced inspection.

Prior to entering the facility, visible emissions and odor observations were conducted at both locations. No odor or opacity was observed. The weather conditions were overcast, 37° F with an ENE wind at 12 mph at the time of inspection.

Upon entering the Fruit Ridge Avenue location, AQD staff DK and CR met with Mr. Andy Ribbens, President, and Mr. Justin Ribbens. Both accompanied AQD staff on the inspection of both facilities, provided requested records, and answered site-specific questions.

Facility Description

Premier Finishing, Inc. (PF) is a metal parts cleaning and finishing facility. The facility is comprised of two locations (3180 Fruit Ridge Avenue and 3682 Northridge Drive). It was determined on July 7, 2016, utilizing the AQD Policy and Procedure on Stationary Sources Determinations (AQD-011) that the two buildings are one stationary source. The facility operates an aluminum anodizing line at the Northridge Drive building location under Permit to Install (PTI) No. 77-15 and is a true minor source of criteria pollutants.

Compliance Evaluation

PTI No. 77-15, FGFUMESCRUBBER

This flexible group is for the aluminum anodizing line consisting of 21 process tanks. Three of the process tanks (EUCAUSTICETCH, EUANODIZE1, and EUANODIZE2) are controlled via a fume scrubber system and vented to ambient air. All other process tanks are vented to the in-plant environment.

Conditions in the permit prohibit the facility from operating any of the three tanks unless a malfunction abatement plan (MAP) was received and approved by AQD. The MAP was last revised in 2020 and was reviewed with site personnel onsite. It requires monthly monitoring of the pressure drop across the scrubber and the pH of the tank. The MAP also instructs maintenance staff to notify the quality manager and follow applicable cleaning procedures if either of the recorded parameters are out of range (normal range is 7-9 pH for the tank and <2.5 inches of water for pressure drop). Records for the scrubber were requested for the previous 6 months. Both pH and pressure drop were within the acceptable range (pH: 7.4 – 8.5, pressure drop: 0.9) and no major replacements had occurred.

The aluminum anodizing and scrubber system was observed during the inspection. At the time of the inspection the process was running and the scrubber was operating. Fumes from the 3

controlled process tanks were observed to be captured by the fume hood. The scrubber pressure drop and water flow were observed to be 0.9 – 1.0 inches of water and 2.5 gallons per minute respectively. The scrubber doors were also opened so DK and CR could inspect the inside of the scrubber. No issues were identified with the packing media or the housing. The scrubber system appears to be well maintained, operating in a satisfactory matter, and PF is maintaining the necessary records. Though stack measurements were not taken, the scrubber stack appears to meet the diameter and height requirements specified in the permit.

Rule 201 Permitting Exemptions

At the end of the anodizing line there is a dip tank containing a mixture of polytetrafluoroethylene (PTFE) and water. It was determined previously that this tank was not included in PTI No. 77-15. The tank is separate from the anodizing line and can be used stand alone. The facility believes the tank is exempt per Rule 287 (2)(c) and keeps records of usage. The facility indicated this tank is sparingly used and stated they haven't purchased PTFE material since December 2016.

The black oxide line was also observed (located at the Fruit Ridge Avenue facility). The black oxide line consists of a cleaner tank, 2 rinse tanks, 3 acid tanks, the black oxide tank, and several rust protectant tanks (emulsified oil). A scrubber is installed and controls the cleaner, acid, black oxide and rust protectant tanks before being vented to ambient air. The remaining tanks are vented internally. At the time of the inspection, the magnehelic gauge was reading 0.10 to 0.25 inches of water. PF believes the process is exempt per Rule 290 and provided emissions records. Though the scrubber controls emissions from select tanks, emissions calculations do not account for control equipment. For 2022, the highest monthly emissions of total toxic air contaminant (TAC) emissions was 139.75 lbs (Mar) and 123.22 lbs (Oct) for 2023 year-to-date, which is less than the 500 lb/monthly limit allowed by Rule 290 for emission that are controlled. Therefore, PF's claim that the black oxide line is exempt via Rule 290(2)(a)(ii) appears acceptable.

Parts washing, passivation, rust removal, and vibratory deburring processes were also observed at the Fruit Ridge Avenue facility and emit into the general in-plant environment. These processes are all metal surface treatment processes and are exempt from Rule 201 permitting under Rule 285 (r) (vi).

Conclusion

Based on the review of records and observations made at the time of the inspection, PF is in compliance with PTI No. 77-15 and any other applicable air quality rules and regulations.

NAME

Dil A King

DATE

12/16/23

SUPERVISOR

[Signature]