

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

P061633850

FACILITY: Monroe LLC		SRN / ID: P0616
LOCATION: 4490 44th Street, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Kal Bird , Technical Manager		ACTIVITY DATE: 03/22/2016
STAFF: David Morgan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:00 P.M. on March 22, 2015, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of Monroe LLC located at 4490 44th Street in Kentwood. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations as well as Permit to Install No. 105-15. Accompanying AQD staff on the inspection was Kal Bird, Technical Manager. Clayton Eves, Recordkeeping Manager assisted with gathering records.

FACILITY DESCRIPTION

Monroe LLC. manufactures gauge pointers as well as other components for automotive gauges and dashboards. Essentially the facility conducts plastic injection molding, paint coating, and assembly. This facility is a synthetic minor source for hazardous air pollutant (HAP) and volatile organic compound (VOC) emissions. The company moved to this location in the summer of 2015 and was in full production in October 2015.

COMPLIANCE EVALUATION

There are approximately 24 plastic injection molding machines exempt from permitting under Rule 286(b).

PTI 105-15, FGPAINTE covers one manual spray booth and one automatic spray booth with curing oven, and associated purge/cleanup solvent use. These booths are used to paint interior plastic automotive parts. The one hand spray booth is used primarily for samples and overflow parts and is not used regularly for production. Filters were installed and appeared well maintained.

The automatic booth is the primary production booth at the facility. All filters were installed and operating properly. This booth is operated roughly two shifts, five days per week.

In addition, the company is required to use high volume low pressure (HVLP) spray guns for coating application. There were two spray guns associated with the manual booth and multiple spray guns with the automatic booth. According to company records, Devilbiss Compact gun with TransTech 513 Air Cap is used on the automatic booth and Devilbiss EGHV (HVLP) guns on the manual booth. The Devilbiss Compact with TransTech air cap is not considered HVLP and therefore does not meet the HVLP requirement of Condition IV.2 of the permit. A violation notice will be sent.

The company is maintaining paint usage, VOC emission records, and HAP emission records on a daily, monthly and 12-month rolling basis in accordance with permit 105-15. Records show a variety of coatings and solvents used at the facility. All paints are sprayed in the robotic booth except for a small amount in the hand spray. Acetone is the main reducing solvent used in the coatings at the facility. The company also uses other solvents for cleanup and purge including MEK, isobutyl isobutyrate, and Haviland deco purge solvent (lacquer thinner).

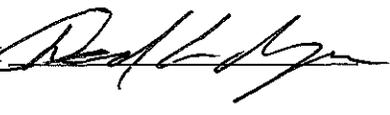
According to company records, the emissions for the period of October 2015 through February 2016 were as follows:

Pollutant	Emission Limit	Actual Emissions	Compliance Status y/n	Comments
VOC	29 tpy	6.47 tpy	Yes	
Xylene	103.6 lb/day	4.09 lb/day	Yes	Highest in Feb. 2016
HAPs (total)	22.5 tpy	1.12 tpy	Yes	
HAPs (Individual)	9.0 tpy	0.14 tpy (toluene)	Yes	
Ethylbenzene	5.8 tpy	0.016 tpy	Yes	

The company uses manufacturer's formulation data to verify coating VOC content. This was approved for the previous location; the company will need to submit a formal request for this location.

SUMMARY

Monroe LLC, will be sent a violation notice for the violation identified above. Company records are attached to this report.

NAME 

DATE 4/26/16 SUPERVISOR PMB