

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

A248136864

FACILITY: INDUSTRIAL FINISHING CO		SRN / ID: A2481
LOCATION: 3620 MILLCREEK, COMSTOCK PARK		DISTRICT: Grand Rapids
CITY: COMSTOCK PARK		COUNTY: KENT
CONTACT: Dan Welch , Owner		ACTIVITY DATE: 09/22/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to investigate a fallout complaint that was received and to determine compliance with General Permit No. 61-09 and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Thursday September 22, 2016 AQD Staff Kaitlyn DeVries (KD) and Chris Robinson (CR) conducted an unannounced, self-initiated inspection of Industrial Finishing Co. Located at 3620 Millcreek, Comstock Park, Michigan. The purpose of this inspection was to investigate a fallout complaint that was received and to determine compliance with General Permit No. 61-09 and all other applicable air quality rules and regulations.

Prior to entry, AQD staff observed the facility for excess odors and opacity. Fleeting odors were noted to the north of the facility, as well as intermittent puffs of opacity (less than 20%) emanating from the easternmost stack. KD and CR entered the facility and met with Mr. Dan Welch, Owner. KD presented Mr. Welch with the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. KD also explained that this visit was in response to a fallout complaint that was received via the DEQ's Office of Environmental Assistance. Mr. Welch explained that he had spoken with the complainant earlier that day and would work with them to reach an agreement in regards to the fall-out. KD went on to clarify that it is AQD's policy and procedure to follow up on such a complaint, which is why AQD staff was there.

Facility Description

Industrial Finishing Co. (IFC) coats wood and other building materials. The facility operates one (1) shift per day, five (5) days per week. The facility has four (4) coating booths and one sanding station.

Regulatory Analysis

IFC currently holds one (1) General Permit No. 61-09, and is not currently subject to any federal regulations. There are several conditions written into the general permit that are not applicable to the facility, and will not be evaluated. Specifically, all conditions related to a catalytic oxidizer, as IFC does not have an oxidizer.

Compliance Evaluation

The sanding station is exempt from Rule 201 permitting under Rule 285 (l)(vi).
FG-COATING

This flexible group covers all of the coating lines and associated purge and clean-up operations where each coating line is a single series in a coating process and is comprised of one or more coating applicators, any associated flash-off areas, drying areas, and ovens where one or more surface coatings are applied and subsequently dried or cured.

IFC has four (4) booths and does not have any curing or drying ovens. All of the coatings air dry in the facility. IFC does not reclaim or re-use any of the coatings. All containers appeared to be properly stored and covered, except those in use at the time of the inspection. KD asked Mr. Welch about the operation of one booth in particular, the one that AQD staff was able to see visible emissions exit the stack. Mr. Welch explained that they had run out of filters, but had ordered more. KD explained that operating that booth without a particulate control device is a violation of General Permit No. 61-09 Special Condition IV.2. Mr. Welch then requested his staff to cease operations in that booth until filters could be obtained. KD asked about the frequency of changing the filters and Mr. Welch stated they typically change the filters every day. At the time of the inspection, the other filters looked like they too needed to be changed.

AQD staff reviewed the records for this emission unit on site. Mr. Welch explained that Rollie Williams Paint Spot tracked the usages, and subsequent Volatile Organic Compound (VOC) emissions. VOC emissions are limited to 2000 lb. /month and 10 tons per year (tpy), 12-month rolling, for each coating line. KD asked if she

could speak to Mr. Welch's contact at Rollie Williams in regards to the available records. KD spoke to Mr. Kevin Curlacker at Rollie Williams on a later date, who explained that the records supplied to IFC are purchase records only and are for the entire facility, not individual booths. Based VOC content data supplied by the manufacturer and the usage information, the highest monthly VOC emissions were in June 2015, with emissions of 1,597.21 pounds for the entire facility. No 12-month rolling data was available. These are violations of General Permit No. 61-09 Special Condition VI.3.d and VI.3.e.

FG-SOURCE

This flexible group covers all coating lines and associated purge and clean-up operations at the stationary source. This includes any coating line covered by this or any other general permit or any permit to install. As previously mentioned, the records, based on purchase information, are for the entire facility, and indicate that the highest monthly VOC emissions were less than 1,600 lbs. VOC's from this flexible group are limited to 30 tpy, 12-month rolling. However, as mentioned above, no 12-month rolling emission calculations were available. This is a violation of General Permit No. 61-09 Special Condition VI.1.

Additionally, since this inspection was in part due to a complaint regarding fallout and potential damage to property, KD is also evaluating the fallout. Upon inspection, the fall-out was sticky, gritty, and covered entire vehicles. Mr. Welch stated that he had spoken with the complainant and would work out an agreement with them to cover any damage to property. It is KD's professional opinion that the fallout associated with the lack of filters in the booth is a violation of Rule 901 (a). See attached.

Compliance Determination

Based on the observations made during the inspection, conversation with Mr. Welch, and an on-site review of the records, it appears as if IFC is not in compliance with General Permit No. 61-09. A Violation Notice will be sent for the following items.

1. General Permit No. 61-09 Special Condition IV.2 – failure to maintain and operate a particulate control device.
2. General Permit No. 61-09 FG-COATING Special Condition VI.3.d – failure to maintain monthly VOC emission calculations for each coating line
3. General Permit No. 61-09 FG-COATING Special Condition VI.3.e – failure to maintain 12-month rolling VOC emission calculations for each coating line
4. General Permit No. 61-09 FG-SOURCE Special Condition VI.1 – failure to maintain source-wide 12-month rolling VOC emission calculations
5. Rule 901 – Injurious effects to property

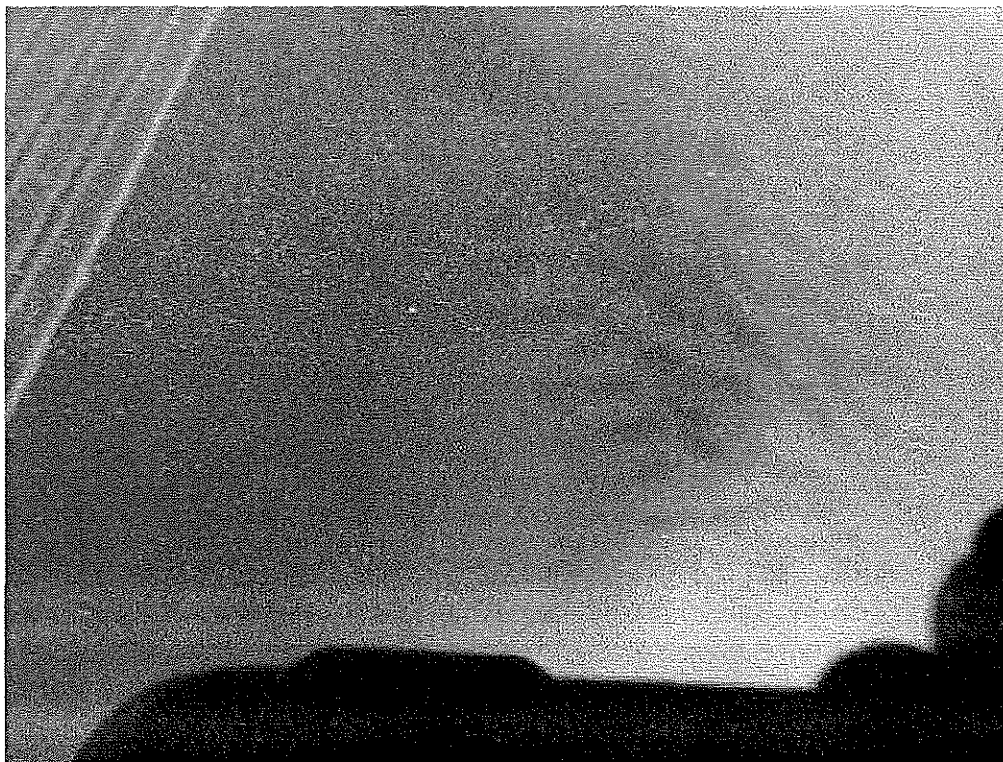


Image 1(Fallout) : An image of the fallout on the property adjacent to Industrial Finishing.

NAME Karlyn Deane

DATE 9/29/2016 SUPERVISOR [Signature]