

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

A248142075

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: 10/17/2017
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 11:00 am on October 17, 2017 to complete a scheduled, unannounced inspection. The weather conditions were partly cloudy, 59°F and a south wind at 15-25 mph.

Facility Description

Industrial Finishing, Inc. (Industrial Finishing) is a wood finishing company, and are currently in operation under one General Permit to Install (PTI) No. 61-09. The layout of the facility consisted of one main operation area, office and storage areas.

Compliance Evaluation

Prior to entering the facility, offsite odor and visible emission observations were completed. No visible emissions were observed. An asphalt odor was identified several times and would be associated with the adjoining asphalt paving company to the south. Upon entering the facility, AQD staff AS met with "Louis," an employee of Industrial Finishing who provided a tour of the facility, and information regarding site operations. Mr. Dan Welch, Owner, was spoken with briefly during and following the inspection and provided select remaining records not immediately available. During the inspection, Louis stated that no significant changes have occurred to the site since 2016.

FG-Coating

The coating area consists of all coating lines and associated cleanup operations. Industrial Finishing utilizes four coating booths. At the time of the operation booths # 1 and 3 were in use. The volatile organic compounds (VOCs) are limited to 2000 lbs/month and 10 tons per year (tpy) for each coating line plus all associated purge and clean-up operations. Additionally, per Special Conditions (SC).VI.3.a-e, Industrial Finishing must keep track of purchase orders and invoices, VOC content, and usage rates for all coatings, reducers, and purge/cleanup solvents; as well as monthly and 12-month rolling total VOC emissions for each coating line.

The company was previously issued a violation notice dated October 5, 2016, for incomplete records. In a phone conversation on November 14, 2016 it was agreed between AQD staff and Industrial Finishing staff that adequate records were to be started on January 1, 2017. Records were requested from January 2017 through September 2017. Upon initially speaking with Mr. Welch, it was concluded that Industrial Finishing has had difficulties in receiving records from their supplier, Paint Spot, for July through September 2017. The records had been received but were not yet in an acceptable format. After further review, it was concluded by AQD staff AS that the immediate unavailability of select records based on difficulty in receiving them from the supplier was not a violation. Several additional requests had to be made before the remaining records were provided. In the future, Industrial Finishing shall provide requested records in a timelier fashion. Per a phone conversation on October 17, 2017 it was concluded that Industrial Finishing is not keeping track of water based coating usage rates for booths # 2 and 4, due to the materials, as stated by Mr. Welch, to contain no VOCs. When non-water based coating materials were used in January 2017 by booth # 2, all appropriate records were available. Copies of Safety Data Sheets (SDS) were requested and reviewed showing small amounts of VOCs. Industrial Finishing in the future shall keep track of usage rates and VOC emissions for booths # 2 and 4. Monthly VOC emission totals for booths # 1 and 3 for September 2017 were 188.35 and 173.05 lbs respectively. Previous monthly emission reports reviewed show that Industrial Finishing is well within the monthly permitted limit of 2,000 lbs of VOC emissions. Since Industrial Finishing has not yet completed a full 12-month time period for recordkeeping, the 12-month rolling total VOC limit is not applicable at this time. Reviewing the remaining records, it appeared that Industrial Finishing is adequately keeping track of purchase orders, invoices, VOC contents, and monthly emissions.

During the inspection waste from purge/clean up solvents and coatings appeared to be properly stored in closed containers and disposed of. Industrial Finishing utilizes high volume low pressure (HVLV) and other select technology for their spray guns depending on the coatings needed. Mr. Welch stated, however, that they do not have test caps on site. In the future, Industrial Finishing shall have test caps on site to pressure test the spray applicators.

Industrial Finishing utilizes dry filters for each of their four spray booths. Filters are changed weekly. Air gaps were observed in all four paint booths around filters in place. A QD staff AS instructed Industrial Finishing staff on proper installation of filters to satisfactorily capture particulate emissions during operation of the paint booths.

Industrial Finishing does not utilize a catalytic oxidizer to reduce VOC emissions.

Four stacks were observed during the inspection that are associated with each respective paint booth. Though the exact dimensions were not measured, they appeared to be consistent with the requirements stated in SC.VIII.1 of PTI No. 61-09.

FG-SOURCE

The VOC emissions are limited for this source to 30 tpy per a 12-month rolling total. Since monthly records have not reached a full 12-month rolling total, these records were not applicable at this time.

Additional Observations

- During the inspection one sanding station was observed that vented directly outside. Observations around the exterior portions of the vent identified small amounts of particulate matter. Based on the amount of particulate observed, no violation will be issued. This was discussed with Mr. Welch on October 17, 2017. Mr. Welch stated that Industrial Finishing shall construct a box around the opening to capture particulate. This will be verified to have been completed during the next inspection.

Conclusion

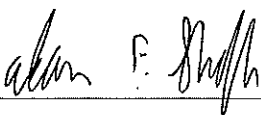
Based on the review of the records provided and the facility walk through, Industrial Finishing appears to be in compliance with PTI No. 61-09 and all applicable air quality rules and regulations at this time.

Recommendations

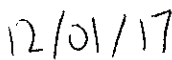
The following are items identified during the inspection and records review that, though are not violations, will need to be completed and will be verified during the next inspection.

- Industrial Finishing will cease venting emissions from the sanding station observed on site unobstructed to exterior portions of the property. A capture device will be completed to capture particulate as stated by Mr. Welch. This will be verified during the next inspection.
- Test caps for HVLV spray applicators will be made available on site for pressure testing.
- Industrial Finishing shall begin keeping track of coating usage rates and VOC emissions for spray booths # 2 and 4.

NAME



DATE



SUPERVISOR

