

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

A272233152

<b>FACILITY:</b> EXPERT COATING CO INC.		<b>SRN / ID:</b> A2722
<b>LOCATION:</b> 2855 MARLIN COURT NW, GRAND RAPIDS		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> GRAND RAPIDS		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Erik Klimek , President		<b>ACTIVITY DATE:</b> 01/27/2016
<b>STAFF:</b> Kaitlyn DeVries	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> The purpose of this inspection was to determine compliance with Permit to Install Number (PTI No.) 317-74A, Consent Order 2-2015, and all other applicable Air Quality Rules and Regulations.		
<b>RESOLVED COMPLAINTS:</b>		

On Wednesday January 27, 2016 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced scheduled inspection of Expert Coating Co Inc. located at 2855 Marlin Court NW, Grand Rapids, Michigan. The purpose of this inspection was to determine compliance with Permit to Install Number (PTI No.) 317-74A, Consent Order 2-2015, and all other applicable Air Quality Rules and Regulations.

KD arrived on site at approximately 9:20 am. No odors or opacity was observed prior to entry into the facility. KD met with Mr. Erik Klimek, President, and presented him with the Environmental Rights and Responsibilities pamphlet was distributed and briefly discussed. KD also requested records at that time, however, Mr. Klimek explained that the person responsible for maintaining the records had just left, but would be able to provide them electronically. The records were hand delivered to KD, reviewed and then given back to Mr. Klimek. The records appeared to be adequate; however, KD would recommend improvements in the recordkeeping for the gallons coating used in the dip tank.

#### **Facility Description:**

Expert Coating Co Inc. (Expert Coating) manufactures, coats, and cleans plating racks made out of various metals including copper and stainless steel. Expert Coating coats the racks it manufactures, in house, with a Polyvinyl Chloride (PVC) coating for which these same racks are returned for stripping.

#### **Regulatory Overview:**

Expert Coating is a Synthetic Minor for Hazardous Air Pollutants (HAPs) for which it has an Opt-out permit. Potential to Emit (PTE) calculations obtained in 2014 showed a potential to emit HCl above the major threshold, thus initiating the Opt-Out permit issued in 2014. Expert Coating is not subject to any Federal Regulations at this time.

#### **Compliance Evaluation:**

The rack manufacturing process includes welding, machining, and soldering of the metals which are vented back into the in-plant environment. These processes are exempt from Rule 201 permitting under Rule 285 (i) and Rule 285 (l)(vi)(B). Expert Coating also has a sand blasting area which is exempt from Rule 201 permitting under Rule 285 (l)(vi)(C).

The racks are then coated in a dip tank with a PVC coating (see attached MSDS's). The dip tank coating operation subsequent cure oven(s) are exempt from Rule 201 Permitting under Rule 287 (c). Per the attached records, Expert Coating uses 192.5 gallons per month of the black coating, which is below the 200 gallon maximum. Records for the green coating (MSDS attached) indicate that a total of 328 gallons were used for the entire 2015 year, with less than

the allowed 200 gallons being used each month. While these records do indicate compliance, KD recommends that Expert Coating improve the record keeping for coating usage and record the usage as used, rather than using purchase orders for compliance.

After the racks are coated, they go through bake and dry ovens for curing. These ovens operate at 350 – 400° F for one (1) hour. Once the plating facility is finished with the rack, it is returned to Expert coating for cleaning (burn-off) and/or repair. Please see below for further evaluation of the burn off process.

Per Mr. Klimek, Expert Coating does not have any parts cleaners, boilers, or emergency generators.

#### PTI No. 317-74A

##### *EUBURNOFF*

Expert Coating is permitted for one (1) batch type natural gas-fired burn-off oven for removal of plastisol coatings from metal parts, which is equipped with a 1 MMBTU/hr afterburner control system.

Per Mr. Klimek, all of the ovens are natural gas only, and they only strip PVC from racks they coated thus ensuring no PCB containing materials or Teflon type materials are used in EUBURNOFF. The burn-off oven was most recently calibrated in October of 2015, and per Mr. Klimek, there have been no malfunctions in the previous 12 months.

At the time of the inspection, the burn-off oven was operating at a temperature of 268°F, with the afterburner at 1404°F, which is above the permitted 1400°F minimum. The oven is equipped with an interlock system that shuts down the primary chamber burner when the afterburner is not operating properly (see attached e-mail from the manufacturer), and the company is in the process of installing an audible alarm if the afterburner temperature drops below the 1400°F minimum. The secondary chamber/ afterburner temperature is continuously monitored via LCD screen, and a review of the records indicate the temperature is being properly recorded three (3) times per burn cycle and is above the 1400°F minimum.

Additionally, while the stack dimensions were not directly measured, there were no apparent changes to any of the stacks.

Expert Coating has a batch limit of 251 batches of parts, per 12-month rolling time period. As of December 2015, the 12-month rolling batch records indicate 98 batches have been stripped (please see attached records).

##### *FGFACILITY*

Since Expert Coating maintains an Opt-Out Permit for HAPs, they are limited to 9.0 tons per year (TPY) for individual HAPs and 22.52 TPY for aggregate HAPs, both 12-month rolling. This limit is for all process equipment source wide including grandfathered equipment and exempt equipment. As of December 2015, the 12-month rolling emissions for HAPs, (individual and aggregate) is 2.05 tons.

#### **Compliance Determination:**

Based on the observations made during the time of the inspection and a subsequent review

of the records, Expert Coating appears to be in compliance with PTI No. 317-74A and Consent Order No. 2-2015.

NAME Kaitlyn Farin DATE 2/19/2016 SUPERVISOR PAB