

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

B735233365

FACILITY: Seaver Industrial Finishing Co.		SRN / ID: B7352
LOCATION: 1645 Marion St., GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Jack Blessman, Facility Manager		ACTIVITY DATE: 02/08/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Jack Blessman, Facility Manager and Steve Dood, Maintenance Manager. The DEQ Environmental Inspections: Rights and Responsibilities brochure was presented and briefly discussed.

FACILITY DESCRIPTION

This facility is a job shop coating metal furniture, plastic parts and other miscellaneous metal parts. The operations are permitted pursuant to Permit to Install No. 70-05B, which limits facility emissions to minor source levels for Hazardous Air Pollutants (HAPs). The Volatile Organic Compounds (VOCs) are limited facility wide to below the Part 7 (Part 6) threshold of 30 tons for plastic parts coating. External visual and olfactory observations were made prior to the inspection, and no visible emissions were seen, and no odors noted. I informed Mr. Blessman and Mr. Dood, that I'd like to conduct a physical inspection, and asked for recordkeeping. Mr. Blessman was able to immediately provide me with overall emissions, and stated that he'd asked the facility consultant Jill Koebbe to e-mail me the detailed records. Mr. Blessman indicated that they are mostly powder coating these days, and spray coating is low VOC and minimal. Emissions are very low, to the level that they are considering either re-permitting or utilizing exemptions for the coating. During this discussion, we talked about having to keep a permit for the burn-off oven. As I thought about eliminating the Opt-out permit, I realized that due to the burn-off oven, the facility may need a HAPs Opt-out even if they do exempt the coating booths. This should be discussed by Seaver staff prior to making a final decision.

COMPLIANCE EVALUATION

Mr. Dood escorted me on a physical inspection of the facility operations. Of the three liquid spray booths, only two are currently in use which is the spray line. The exempt batch booth may be physically removed from the site in the future. I observed the filters (double bank) in the spray booths in use which appeared correctly placed. Mr. Dood keeps a written log of the booth filter change out, and this recordkeeping was up-to-date. Mr. Dood also keeps a written log of the gun tip pressure test that he conducts, to ensure the compliant gun stays below 10 psia at the tip. All records observed indicate compliance with this requirement.

EUSPRAYLINE

The permit limits VOC's from the spray line to 40 tons per 12-month rolling time period. Emissions for the 12-month period calendar year 2015 are reported as 1.01 tons VOC. Plastic parts coating are limited to 10.0 tons from this line. The company reports that no plastic parts are being sprayed on this line. Total VOC emissions from plastic parts are limited to 2,000 lb/month. As previously indicated, the company reports that they are not spraying plastic parts on this line. The material limits are held at 3.0 lb/gallon (minus water) as applied in EUSPRAYINE. There are coatings in the records under the heading "POLANES, POLY OR SOLVENT SPECIALTIES BATCH". It is noted that now that the batch booth is gone, several of these coatings are above the 3.0 lb/gallon limitation, and should not be used on the EUSPRAYLINE going forward. Other coatings reviewed from the information provided do not have a VOC content over the 3.0 lb/gallon limit.

During the inspection, I did not note any improper waste disposal, or open containers of solvent. Filters were appropriately placed to capture particulate, and as indicated the facility is using HVLP equivalent spray technology.

Recordkeeping was available and up-to-date, however it does not identify the substrate the coating is applied to on a per coating basis as it should, which is the only deficiency as noted. This can and should be added to the records going forward.

The stacks were not measured during the inspection, but no changes have been recently made.

EUBURNOFFOVEN

The burnoff oven is required to maintain and measure the temperature of the afterburner at a level above 1,400°F at all times. This unit was running and the afterburner was at a temperature of 1,714°F at the time of the inspection. Mr. Dood keeps a log of his weekly non-certified visible emission readings, which he showed me in his office. This unit is not known to have any visible emissions. It only has steam emissions if and when the burn gets too hot and the water deluge or spray engages to cool the unit down. This does not happen every time the unit operates. Mr. Dood conducts daily visual inspections of the furnace operations as required.

As previously indicated this burnoff oven is likely a source of HAP that currently is unregulated do to the age of the oven. However, it is important that prior to changing the current permit, that this is evaluated. Voiding the permit without ensuring that the emissions from the oven do not have the potential emissions to be a major source of HAP would be a mistake to overlook. Depending on the coatings being "burned off" hydrogen fluoride and hydrogen chloride emissions may be present.

FGFACILITY


The facility has synthetic limits for individual HAP at less than 9.0 tons, and aggregate HAP emissions at less than 22.5 tons. Additionally, all plastic parts coatings are limited to less than 30.0 tons. These are 12-month rolling limits. The highest individual HAP reported for 2015 was xylene at 0.01 tons. The aggregate HAP for the same period was reported at 0.03 tons. The total VOC emissions for plastic parts coating for the facility was 0.03 tons.

The facility also utilizes the Rule 287(c) exemption for the Batch booth. This booth as indicated, is no longer in use, and will be dismantled. The records do account for this booth.

A majority of the coating done at this facility is in the form of powder coating, and this area was also observed. Seaver conducts a significant recycling approach and reclaims up to 90% of the powder coating used in this system. This coating line is exempt per Rule 287(d).

COMPLIANCE SUMMARY

This facility was in compliance at the time of the inspection.

NAME 

DATE 2-17-16

SUPERVISOR PAB