

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

N122925155

FACILITY: PRS MANUFACTURING CO		SRN / ID: N1229
LOCATION: 3745 DYKSTRA DR, WALKER		DISTRICT: Grand Rapids
CITY: WALKER		COUNTY: KENT
CONTACT: Dennis Kowalczyk , Owner		ACTIVITY DATE: 04/23/2014
STAFF: Jenifer Dixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: The purpose of this inspection was to complete a self-initiated inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations, Permit No. 915-85 as well as to request a PTE demonstration.		
RESOLVED COMPLAINTS:		

This was an unannounced inspection. An "Environmental Inspections" brochure was provided at the time of the inspection.

The purpose of this inspection was to complete a self-initiated inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations, Permit No. 915-85 as well as to request a PTE demonstration.

JD arrived in the area of the facility at approximately 1:00PM and departed at 2:30PM. No odors or excess opacity was observed during the time before, during, or after the inspection. Mr. Dennis Kowalczyk, owner, provided pertinent information regarding the facility and the operations contained therein.

PRS Manufacturing CO (PRS), manufactures coats and cleans plating racks made out of stainless steel, copper and tungsten. The manufacturing process includes metal grinding, cutting, torching, and other metal working activities which are exempt from Rule 201 permitting requirements under Rule 285(l)(vi).

The coating and cleaning process include a polyvinyl chloride dip tank coating operation, sand blasting, a bake oven and dry oven for the polyvinyl chloride coating, as well as burn-off oven to clean the racks once the plating company is done with them. The coating tank was not operating at the time of the inspection but the burn-off oven was operational.

PERMIT NO. 915-85

This permit covers the strip (burn-off) oven, the pre-heat oven, and a cure oven all used for the refinishing of plating racks.

The special conditions from the permit are detailed below:

- 14. Rule 331 – The particulate emission from the strip and bake ovens individually shall not exceed 0.10 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis.

Compliance with this condition is based on the assumption that the unit is operating properly. At the time of the inspection, the units appeared to be operating properly and are therefore assumed to be in compliance with this condition.

- 15. Visible emissions from the strip and bake ovens shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a).

No visible emissions were observed before, during, or after the inspection.

- 16. Rules 1001, 1003, and 1004 – Verification of particulate emission rates from the strip and/or bake ovens by testing, at owner's expense, in accordance with Commission requirements, may be required for operating approval. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division and results shall be submitted within 120 days of the written requirement for such verification.

No stack testing is requested at this time. NOTE: The Air Quality Division no longer has a commission.

17. Applicant shall not operate the strip or bake ovens unless the respective afterburner is installed and operation properly.

At the time of the inspection the afterburner temperature indicated proper operation of the unit. Based on a conversation with Mr. Kowalczyk, the unit is in good condition and there is written records that also indicate compliance.

18. Applicant shall equip and maintain each afterburner with a temperature gauge.

Both of the ovens are equipped with digital temperature gauge read-outs. There is no chart recorder, but Mr. Kowalczyk does physically record the temperature while the unit is in operation.

19. The exhaust gases from the strip oven shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 12 inches at an exit point nor less than 24 feet above ground level.

Based on visual observations of the stacks, these dimensions appear to be met. The stacks were not physically measured. Additionally, in speaking with Mr. Kowalczyk, the height of the stack was raised based on complaints from neighbors.

20. The exhaust gases from the bake oven shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 12 inches at an exit point nor less than 35 feet above ground level.

Based on visual observations of the stacks, these dimensions appear to be met. The stacks were not physically measured. Additionally, in speaking with Mr. Kowalczyk, the height of the stack was raised based on complaints from neighbors.

21. Applicant shall not substitute any raw material (plastisol) or fuel for those described in this permit application which would result in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the Air Quality Division.

According to Mr. Kowalczyk, no substitutions have been made.

22. Applicant shall not operate the strip or bake oven unless a minimum temperature of 1400 degrees F and a minimum retention time of 0.5 seconds in the respective thermal oxidizer is maintained.

Based on observations made at the time of the inspection the units were operating above the stated minimum temperature.

HCI Discussion


Based on the physical inspection, the company appears to be in compliance with state and federal rules and regulations and PTI 915-85 at this time. However, PTI 915-85 does not restrict the use of PVC in the burn off oven, therefore JD requested that Mr. Kowalczyk submit a Potential to Emit (PTE) demonstration for the HCI from the burn-off process.

Mr. Kowalczyk provided the PTE, which indicated that the potential emissions of HCI were approximately 18 tons per year. This is above the major source threshold for emissions from a single hazardous air pollutant (HAP).

Based on the PTE demonstration, the facility is required to apply for a permit modification in order to ensure that operational and/or material limits are in place that will keep actual emissions from exceeding the HAP major source limit. Based on current operations at the facility, the actual emissions are much lower than those indicated by the PTE.

JD and Mr. Kowalczyk have discussed what is needed in order to start the permit process. JD has provided Mr. Kowalczyk the information needed to complete the application as well as to schedule a pre-application meeting.

Based on information from Mr. Kowalczyk, PRS has not exceeded the major source threshold for a single HAP. The facility is considered in compliance with Permit No. 915-85. JD will continue to follow-up on the progress of the new permit application.

NAME 

DATE 5/19/14

SUPERVISOR PAB

