

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

N122933151

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: 01/27/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with Permit To Install Number (PTI No.) 915-85A and all other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On Wednesday January 27, 2016 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced scheduled inspection of PRS Manufacturing Co. located at 3745 Dykstra Dr. Walker Michigan. The purpose of this inspection was to determine compliance with Permit to Install Number (PTI No.) 915-85A, Consent Order AQD 56-2014 and all other applicable Air Quality Rules and Regulations.

KD arrived at the facility at approximately 12:30 pm and left the facility at approximately 2:30 pm. KD surveyed the perimeter of the facility prior to and after inspecting the facility. No excess odors or opacity was noted. KD presented and briefly discussed the Environmental Rights and Responsibilities pamphlet with Mr. Dennis Kowalczyk, owner, before a tour of the facility. All records were reviewed on site and were deemed acceptable, with the exception of the Rule 287 (c) records, which will be outlined in further detail below.

Facility Description:

PRS Manufacturing Co. (PRS) manufactures, coats, and cleans plated racks made out of various metals. PRS is a batch shop, and only operates one (1) shift per day, five (5) days per week, and does not use the burn-off oven every day.

Regulatory Overview:

PRS has an opt-out permit for HAPs, PTI No. 915-85A. This is the only permit held by the facility, and it is not subject to any federal regulations at this time.

Compliance Evaluation:

PRS has several welding and soldering stations, which are exempt from Rule 201 permitting under Rule 285 (i). There is also a sandblasting area, which is exempt from Rule 201 Permitting under Rule 285 (l)(vi)(C).

There is also a dip-tank coating area located in the facility. The racks are coated with a polyvinyl chloride (PVC) coating (see attached MSDS's). The coating process, including cure oven(s) is exempt from permitting under Rule 287 (c); however, no records were available for determining compliance with the 200 gallon limit. Additionally, per Mr. Kowalczyk, it is likely that PRS has exceeded this limit during some months. This is a violation of Rule 201, for failure to keep required records for Rule 287 (c). A Violation Notice (VN) will be sent.

PTI No. 915-85A

FGOVENS

This flexible group covers the (2) natural gas field burn-off ovens used for application of and/or removal of plastisol coatings from metal bars. The emission units are EU-STRIPOVEN and EU-BAKEOVEN. Both the bake oven and the strip oven are equipped with LCD screens that indicate the temperature of the oven and the afterburner. During the time of the inspection, neither oven was in use. The strip oven is also equipped with water spray technology in case the temperature gets too high and water is needed to cool the system down. The duration and amount of water used is recorded by PRS. The afterburner temperature is restricted to a minimum of 1400°F. Per a review of the records from January 2015 through December 2015, only the primary oven chamber (typically operated at 325°F - 410°F) was being recorded, and the temperature was only being recorded one time per batch. These are violations of FGOVENS Special Conditions (SC) VI.2, for failure to monitor the burn-off oven secondary chamber afterburner and record the temperature at least three (3) times per batch. This will be included in the VN.

PRS is limited to 150 batches of metal parts in FGOVENS per 12-month rolling time period. As of December 2015, PRS had done a total of 92 batches.

Per Mr. Kowalczyk, there have been no major malfunctions in the past year. PRS does track the date, duration and description of when the strip oven needs to utilize the water spray for control. Additionally, PRS is tracking the regular maintenance done to the units. The ovens were due for calibration days after KD visited. KD later confirmed, via email, that the ovens were indeed calibrated on January 29, 2016.

While the stack dimensions were not directly measured, there appeared to be no changes.

Compliance Determination:

Based on the observations made during the inspection and a subsequent review of the records, PRS Manufacturing is not in compliance with PTI No. 915-85A. A violation notice will be sent for the following items.

1. Rule 201 – Failure to keep the required records for Rule 287 (c)
2. PTI No. 915-85A, FG-OVENS, SC VI.2 – Failure to monitor the burn-off oven secondary chamber afterburner and record the temperature at least three (3) times per batch.

KD discussed both of these violations with Mr. Kowalczyk after the inspection, and he indicated that he would be notifying the oven operators to monitor and record the afterburner temperature at least three (3) times per batch. Mr. Kowalczyk also indicated that he would now start to track the amount of coating that was being used.

NAME



DATE

2/16/16

SUPERVISOR

