

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

N228339290

FACILITY: Enamelite Industries, LLC		SRN / ID: N2283
LOCATION: 3829 Roger B. Chaffee Memorial Blvd. S.E., GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Jennifer Scott , Office Manager		ACTIVITY DATE: 03/30/2017
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, self-initiated inspection and met with Jennifer Scott, Office Manager.

PLANT DESCRIPTION

Enamelite Industries, LLC is a plastic part coating facility that provides a service to the automotive and furniture industries. All products painted are customer supply- which means that Enamelite doesn't own the part, it is providing a service to those that do. The painting operations are permitted pursuant to Opt-out PTI No. 46-14, which allows for coating plastic and metal parts. There are 13 booths on-site that are in use in various capacities. Generally they are not all in operation at once, because there are only so many painters employed at Enamelite.

COMPLIANCE EVALUATION

Ms. Scott and I discussed the recordkeeping upon arrival and we discussed the facilities methods of recordkeeping that include both excel spreadsheets and the Emtrak software. We discussed the level of recordkeeping that I request would likely be in a tiered approach so that compliance is assured.

Opt-out PTI covers EU-LINE1, EU-LINE2, EU-LINE3, EU-OL3, EU-OL4, EU-OL5A and EU-OL7, and consists of a total of thirteen spray booths, with all coating application applied manually. We discussed that Enamelite is utilizing all HVLP guns and that test caps should be available for confirming that the pressure is less than 10 psia at the tip.

I observed the filter placement on all booths, which consist of a double filter set up. All appeared to be properly installed. We observed the paint mix area, where I suggested that even though the coatings were being actively mixed, a lid should be made that can slide over the top with a slot for the mixing shaft. Ms. Scott indicated they would get that done.

FG-COATING

Emission Limits

Each line has a specified emission limit for Volatile Organic Compounds,(VOC) as well as a total VOC limit for FG-COATING. Total reported facility VOC emissions are 9.67 tons for 2016. This total is lower than all the limits at the facility which are: FG-COATING 60.0 tons, each booth of EU-LINE1 43.7 tons, each booth of EU-LINE2 42.6 tons, each booth of EU-LINE3 42.0 tons, EU-OL3 37.8 tons, EU-OL4 37.8 tons, EU-OL5A 41.6 tons, EUOL-7 42.4 tons. Reported emissions demonstrate compliance with the mass VOC emission limits for all emission units.

The FG also has limits for coating VOC content based on a daily volume-weighted average per coating category. Currently they are only applying air dried coatings with a limit of 5.0 lb/gal VOC and a couple high bake clear coats with a limit of 4.5 lb/gal VOC. The majority of the coatings used at the facility comply with the limit on an instantaneous basis. Due to the rules of rounding the daily volume weighted average would need to be 5.05 lb/gal VOC or above to exceed the limit of 5.0 lb/gal VOC.

Process Operational Limits

During the inspection, coatings, thinners and waste were observed stored in closed containers to minimize emissions. The permittee is keeping daily oven temperature records, which were observed and reviewed. The air-dried coating temperatures were below 194°F.

Design/Equipment Parameters

Filters were observed properly installed. Ms. Scott and I discussed the 10 psi requirement for HVLP guns, as well as procuring pressure test caps to make sure. According to Ms. Scott, all guns used at this facility are HVLP. As previously indicated, oven temperature records are being maintained.

Testing/Sampling

This permit has conflicting requirements for VOC content. The testing condition requires Method 24, or manufacturer's formulation data if approved by the district supervisor. Approval has been given. However, in the Monitoring/Recordkeeping portion, it allows MSDS's (SDS) to be used to determine the weight percent of each component. The facility is currently using SDS's which seems appropriate.

Monitoring/Recordkeeping

Technically, each requirement for recordkeeping is being met in FG-COATING. However, because the facility is using two different types of databases which makes a compliance determination challenging.

Stack/Vent Restrictions

No stacks were measured however no changes were apparent.

FGFACILITY

Emission Limits

The facility is limited to less than 9 tons individual HAP per 12-month rolling time period. The highest reported individual HAP was xylene at 0.34 tons. The facility is limited to less than 22.5 tons aggregate HAP per 12-month rolling time period. Reported 12-month aggregate HAP emissions are 0.72 tons.

Monitoring/Recordkeeping

The facility is keeping records of individual HAP's but could use improvement. Emissions of MEK are still being reported despite the fact that it was delisted in 2006. Methanol (1.42%) and formaldehyde (0.02%) are in one material used, but not listed. This product is not used very often but needs to be added to the HAP emissions records as required. There is no indication these minor issues impact compliance, as Enamelite is reporting emission below the limits.

Enamelite Industries, LLC should apply the discreet changes as mentioned above and submit an updated format to AQD by June 1, 2017.

CONCLUSION

Enamelite Industries, LLC was in compliance at the time of the inspection.

NAME 

DATE 4-24-17

SUPERVISOR 