

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Off-site Inspection

N228356795

<b>FACILITY:</b> Enamelite Industries, LLC		<b>SRN / ID:</b> N2283
<b>LOCATION:</b> 3829 Roger B. Chaffee Memorial Dr S.E., GRAND RAPIDS		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> GRAND RAPIDS		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Gregg Gruizenga , Owner		<b>ACTIVITY DATE:</b> 01/28/2021
<b>STAFF:</b> April Lazzaro	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Off-site records review.		
<b>RESOLVED COMPLAINTS:</b>		

Staff, April Lazzaro contacted the facility to initiate an off-site inspection consisting of a records review. I learned that my former contact is no longer with the company, so I discussed the inspection process with Gregg Gruizenga and Janet Miller.

**PLANT DESCRIPTION**

Enamelite Industries, LLC is a plastic parts 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. In discussions with Mr. Gruizenga and Ms. Miller, production has been down, the company has recently been sold, and will be completely closing in 2021.

I was put in contact with Jennifer Scott, the former emissions records keeper who is employed on an "as needed" basis for assistance with the required records. I learned that the facility had not maintained records on a daily basis since July, but that all the data and coating usage was being maintained and it wouldn't take long to do the data entry into the systems used for calculating emissions. Ms. Scott conducted this data entry and provided the information in a timely manner.

**COMPLIANCE EVALUATION**

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. Enamelite historically has utilized all HVLP guns and test caps should be available for confirming that the pressure is less than 10 psia at the tip. This information has been confirmed during past on-site inspections.

**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 9.65 tons for the 12-month period ending November 2020. 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. I discussed this concept directly with Mr. Gruizenga and Ms. Miller during a phone conversation, and how the operators need to be aware of this daily average limit. Since production is reduced, it could be an issue if very few coatings are applied on any given day.

#### **Process Operational Limits**

Operational limits will be observed during a future on-site inspection. During a previous inspection, coatings, thinners and waste were observed stored in closed containers to minimize emissions. I confirmed with the permittee that the air-dried coating temperatures were below 194°F.

#### **Design/Equipment Parameters**

These parameters will be observed during a future on-site inspection. During a previous inspection, filters were observed to be properly installed.

#### **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. In addition, the staffing changes and the off-site records request made for additional communication challenges.

#### **Stack/Vent Restrictions**

During previous inspections stacks were not measured however no changes were apparent at that time. These will be observed during a future on-site inspection.

### **FGFACILITY**

#### **Emission Limits**

The facility is limited to less than 9 tons individual HAP per 12-month rolling time period.

The facility did not supply records of individual HAP upon request. 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 1.2 tons, which is below the limit for individual HAP and aggregate HAP and therefore indicates compliance with both limits.

#### **Monitoring/Recordkeeping**

The facility is not keeping records of individual HAP's however, emissions of aggregate HAPs are below the individual HAP limit. Since the facility is closing, a Violation Notice will not be issued at this time.

### **CONCLUSION**

While there were several challenges faced during this off-site records review, it was determined that Enamelite Industries, LLC was in compliance at the time of the inspection.

NAME April Lazzaro

DATE 01/28/2021

SUPERVISOR HH