

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

N228358107

FACILITY: Enamelite Industries, LLC	SRN / ID: N2283
LOCATION: 3829 Roger B. Chaffee Memorial Dr S.E., GRAND RAPIDS	DISTRICT: Grand Rapids
CITY: GRAND RAPIDS	COUNTY: KENT
CONTACT: Gregg Gruizenga , Owner	ACTIVITY DATE: 05/06/2021
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance
SUBJECT: Announced, scheduled inspection.	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

Staff, April Lazzaro arrived at the facility to conduct an announced, self-initiated inspection and met with Gregg Gruizinga, Owner and Charlie Adams, who was there to assist Mr. Gruizinga on the inspection. This inspection was announced due to the ongoing global pandemic. Proper PPE was utilized and social distancing measures were followed.

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 at the facility that are in use in various capacities.

COMPLIANCE EVALUATION

During the pre-inspection meeting, I discussed the USEPA Compliance Monitoring Strategy, Full Compliance Evaluation criteria, and informed Enamelite that this Partial Compliance Evaluation would be combined with the previous records review. These two inspections will be part of the Full 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. All coating application is 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. Mr. Adams confirmed that they do have, and utilize, the test caps as needed.

I observed the filter placement on all booths, which consist of a double filter set up. All appeared to be properly installed. We also observed the paint mix area, where all containers appeared properly enclosed with lids and bungs in place.

FG-COATING

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 reviewed during the off-site inspection. The air-dried coating temperatures were below 194°F.

Design/Equipment Parameters

The spray booth filters were properly installed. Mr. Adams and I discussed the 10 psi requirement for HVLP guns, they have procured pressure test caps since the last inspection. According to Mr. Adams, all guns used at this facility are HVLP

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

The facility recordkeeping was evaluated during the off-site inspection and found to be compliant.

Stack/Vent Restrictions

No stacks were measured however no changes were apparent.

FGFACILITY

Emission Limits

The reported emissions were evaluated during the off-site inspection and found to be compliant.

Monitoring/Recordkeeping

During the off-site inspection records review, I discussed with Enamelite that they need to be careful with the daily pound per gallon as applied VOC limit. This was discussed during the on-site inspection as well, and while it has been challenging, they continue to comply with the limit. We briefly discussed voiding the permit and whether or not the Part 6 VOC coating content limits would still apply. We decided to continue the discussion if needed at a later date.

CONCLUSION

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

NAME April Lazzaro

DATE 05/19/2021

SUPERVISOR HH