

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

N375148102

FACILITY: DECC CO INC		SRN / ID: N3751
LOCATION: 1266 WALLEN SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Mark Piersma , Engineering Manager		ACTIVITY DATE: 02/20/2019
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

AQD staff, April Lazzaro and Joy Taylor-Morgan arrived at the facility for an unannounced, scheduled inspection and met with Mark Piersma, Engineering Manager.

FACILITY DESCRIPTION

The Decc Company, Inc. is a specialty coater of metal parts using dry film lubricants such as Teflon (PTFE), anti-corrosive coatings and decorative coatings. The company has conveyORIZED coating lines with electro-static robotic spray applicators, electrostatic hand spray booths and tumble-barrel coating machines used to apply water and solvent based coatings. The facility currently operates under three permits; Permit to Install (PTI) No. 183-93 which covers an Ace burn-off oven model # RKG 240, PTI No. 87-09 which is a General PTI for coating operations, and PTI No. 7-07B which is an facility-wide Opt-out for Hazardous Air Pollutants.

COMPLIANCE EVALUATION

PTI No. 183-93 covers the burn-off oven and states that there shall be "no visible emissions from the oven". The oven was not in operation at the time of the inspection, however I did re-visit the site to observe the oven in operation. During the second visit, I met with Brent Hudson, Maintenance Supervisor who is the main operator of the burn-off oven. It was preplanned that the oven would be loaded, but would not be operating when I got there, which is what I observed. Brent initiated a cold start, and both the afterburner and main chamber started up 40 seconds later. Brent had installed a thermocouple on the stack to see the afterburner temperature and right away it was up to 1,250°F. He stated that when the oven comes up to temp which is 950°F the afterburner peaks at about 1,800°F. A view of the temperature charts of the main chamber indicates that the temperature is very steady once it reaches the programmed temperature. Since there are no temperature requirements in the permit, this method of operation appears acceptable.

General PTI No. 87-09 covers EULINE4, EULINE5 and EULINE6 as well as all associated ovens.

EULINE4 is a high usage line that has emissions ducted to a regenerative thermal oxidizer (RTO).

Historically, the facility has turned the unit on and off, depending on emissions so that they are below the 2,000 lbs/month limit. Now, emissions are vented to the RTO all the time. The RTO was observed, and physically appeared maintained. Mr. Piersma indicated that it gets a thorough inspection annually and has always gotten good reports. Any recommended maintenance items as a result of the inspection are completed timely. The temperature of the RTO at the time of the inspection was 1,506°F which is above the minimum requirement of 1,400°F. This line has three booths (B1, B2, B3) and uses an integrated database for recordkeeping. The color changes on this line can be extensive – up to 20 per day and the integrated database helps to accurately track usage of each coating used by weight. The three stacks of the booths are connected overhead in a common duct, and then go to the RTO for destruction. The proper disposal method for gun cleaning solvent is to spray in a bucket and recover and dispose as waste. Spraying solvent to the booth filter for evaporation/thermal destruction is not a proper disposal method.

EULINE5 has two booths (B1, B2) and one oven and currently utilizes hand spray applicators, however B2 will soon be switched to a rotary applicator. It is not vented to the RTO at this time, however there is talk of replacing the existing RTO with a larger one and adding emissions from this line to the control device. Due to the location of the existing RTO, there would be a period of time where it would be removed and the new unit installed and the company will need to work with AQD field staff and permit section staff if there are any emissions and permitting issues expected.

EULINE6 is a no VOC, airdried coating line that utilizes an electrostatic applicator. This line is going to move to a new location at the other end of the plant.

EUTUMBLE is an area with multiple tumble coaters that join and are emitted through one of two stacks. These date back to the late 1970's.

R&D- the R&D area upstairs has three paint booths and one oven for trial runs of new products.

Batch Oven #6 and #9 have been added to the general permit and they are shared ovens that are used for a variety of curing options.

There is a facility WWTP pre-treatment system and a new alkaline soap parts washer in the treatment area.

We observed the paint can disposal area which was found in disrepair. There was a couple dozen 5 gallon paint cans accumulated, all with some level of liquid waste in the bottom. It was clear that they were letting the paint harden in that area, all VOC's volatilize into the air and then disposing of any solids. This is considered improper disposal of waste and that was discussed while we were in the room. The liquids need to be properly drained into a satellite container(s) and disposed of properly. Mr. Piersma had not been aware that the can disposal was not being maintained and immediately took action to correct the issue. Within a short time Mr. Piersma had followed-up with me with a formal procedure for proper disposal methods (see attached). Additionally, when I was on-site for a follow-up visit and sampling, I asked to see this area to ensure that the follow-up was continuing. We did observe the area to be in good condition during the second day of observation.

In the solvent storage room, there is an acetone distillation unit with a capacity of about 25 gallons. This meets the permit exemption Rule 285(2)(u) because it has a capacity of less than 55 gallons.

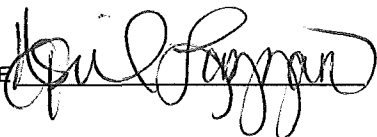
Recordkeeping was requested for both the General PTI and the HAPs Opt-out permit. While on-site, Mr. Piersma walked me through the various tabs for recordkeeping and we discussed the proposed burn-off oven, which is currently in house. The permit has been delayed because the AQD has requested that we have permission to take coating samples to determine whether or not PFAS is in them and becoming an air contaminant. Following this delay, it was determined that the PFAS was low enough to pass the AQD screening level without restriction and as such the permit to install was issued. We also discussed hydrogen fluoride (HF) emissions from the existing burn-off oven. I mentioned to Mr. Piersma previously that if the new oven will have HF emissions, the existing oven also has HF emissions. HF is a HAP, so I asked Mr. Piersma if he is currently calculating HF emissions toward the facility-wide HAPs limit of 22.5 tons per year on a 12-month rolling time period. He replied that he is not. Otherwise, all recordkeeping is in order.

COMPLIANCE SUMMARY

In summary, the actual emissions of HF from both burn-off ovens need to be added to the facility-wide HAP records and additional compliance evaluation conducted.

Decc, Co. is considered in compliance at this time.

NAME



DATE

4-12-19

SUPERVISOR

