

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

N523926780

FACILITY: MOONLIGHT INDUSTRIES INC		SRN / ID: N5239
LOCATION: 5320 W RIVER DR, COMSTOCK PARK		DISTRICT: Grand Rapids
CITY: COMSTOCK PARK		COUNTY: KENT
CONTACT: Michael Falk , Environmental Coordinator		ACTIVITY DATE: 09/02/2014
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT:		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an announced scheduled inspection to discuss options available to replace Rule 208a designation and determine compliance with state and federal Air Quality rules and regulations, PTI No.906-92, Rule 208(a), and Rule 610 and 632. DP drove around the area prior to entering the facility. There were no odors, fugitive emissions or opacity noted from the facility. In the parking lot in front of the building, there was a slight (2) intermittent odor of paint. DP met with, Michael Falk and after a brief introduction and discussion, DP explained the purpose of the inspection and reviewed the Environmental Inspection brochure.

Michael expressed interest in applying for a HAPs Opt-out permit to limit their potential of HAPS. After reading over the instructions he said he would like to apply for 10 tons and 25 tons of HAPS. DP explained about the 30 day public comment period unless the limit is 90% or less of the 10 tons and 25 tons for HAPS. DP briefly explained the PTI application process and the additional information that would be required. Later, DP forwarded information regarding the September 3 PTI workshop in Lansing. Michael sent an e-mail that he is going to participate and have the Permit Section assist with his Opt-out application. DP suggested he discuss with the Permit Section staff possible changes to the recordkeeping requirements so that he can use purchase records instead of as applied records, the method currently required to calculate compliance with the Part 6 Rules.

Moonlight Industries paints miscellaneous plastic, fiberglass, metal and wood parts with liquid coatings. The majority of the parts or jobs are plastic parts but they also occasionally paint wood and metal. They operate one shift and have a ~ 10 employees including office and manufacturing. There are a total of 10 booths 7 for coating 3 are used for sanding, one infrared oven, and a still. The still is used to reclaim MEK (exempt under Rule 285 (u)). Records used to demonstrate compliance are attached or were based on the 2013 MAERS submittal. Record keeping is based on purchasing records as described in the permit application Section 3.1.

PTI No. 906-92 Special Conditions

15. The VOC emission rate from the ten paint booths shall not exceed 101.5 pounds VOC per hour nor 29 tons VOC per year. In the 2013 MAERS they reported 8.9 tons VOC below the 29 tons per year. VOCs 101.5 pounds per hour compliance was determined by cutting the hours in half and doubling the tonnage reported a worse-case operating scenario of 20 hours a week, 1040 hours a year at 17.8 tons equals 34.23 pounds of VOC so at the actual 8.9 tons they are still well below the 101.5 pounds VOC per hour limit.

16. There shall be no visible emissions from the ten paint booths. There were no exterior visible emissions from the stacks and had carts that were larger than the booths so painting was occurring outside the metal boundaries of the booth. A couple of the sides of the booths did have sheet metal that could be extended for the bigger carts. DP recommend that all painting should be done in the confines of the booth itself.

17. Applicant shall not use more than 1000 gallons per year of coatings, as applied, for the purpose of coating metal furniture. A calendar month usage record for the amount of coatings, as applied, used for the purpose of coating metal furniture shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. The company does not track coatings used for metal furniture. Total gallons based on purchasing records and reported in 2013 MAERS was 3067 gallons. They claim five percent is a high estimate for metal furniture. To exceed the 1000 gallons per year limit they would have to run, at a minimum, thirty percent metal furniture.

18. A calendar month usage record for all coatings and thinners used shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. Records are not being kept on usage but on purchases for the month and purchase records demonstrate compliance.

19. The exhaust gases from the paint spray booths shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 24 inches at an exit point not less than 29 feet above ground level. A roof inspection was not conducted as part of this compliance inspection.

20. Applicant shall not operate the paint spray booths unless all exhaust filters are in place and operating properly. The three booths operating during the inspection all had mat panel filters in place that were operating properly but some parts were being sprayed outside of the confines of the booth.

RECORD KEEPING NOTE

All usage records are based on purchase records not actual usage. Daily usage is based on the purchases for the month divided by the number of coating days. The same is used for the pounds per hour calculations. The monthly usage rate divided by the number of eight hour days they are actually coating. They are subject to Rule 610, Rule 621 and Rule 632. Each of these regulations will be discussed individually.

They currently paint metal furniture parts (Rule 610). However, they estimate 5% of their total coating jobs are for metal furniture. This estimate is on the high side. Rule 632 for volatile organic compounds from existing automobile, truck, and business machine plastic part coating lines. They do not have any order that would fall under this category and therefore, would not be applicable to their operation.

Following a discussion with Heidi Hollenbach and based on memo from Bob Irvine (see previous inspection report), Rule 610 allows for all of the substrates in the rule combined to be up to 100 pounds per day or 2000 pounds per month. Therefore, they are allowed 100 pounds per day for metal coatings, 2000 pounds per month for metal coatings, 2000 pounds per month and 10 tons per calendar year per plastic part coating line and less than 30 tons at the stationary source.

Moonlight Ind. using purchasing records and doing a 12 month rolling average they are able to comply with the 100 pounds per day in the Part 6 rules.

Moonlight Industries is considered in compliance with PTI No.906-92, Rule 208(a) and all other AQD State and Federal rules and regulations. Until a feasible method of record keeping can be established in the new Opt-out PTI, they will continue to use purchase records and will be considered to be in compliance with Part 6 regulations.

NAME *Aerise Dufca* DATE *9-15-14* SUPERVISOR *PAAB*