

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

N524032441

FACILITY: KNAPE INDUSTRIES INC		SRN / ID: N5240
LOCATION: 10701 NORTHLAND DR, ROCKFORD		DISTRICT: Grand Rapids
CITY: ROCKFORD		COUNTY: KENT
CONTACT: William Knape , President		ACTIVITY DATE: 12/04/2015
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to verify compliance with Permit to Install No. 26-97 and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Friday December 4, 2015 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced scheduled inspection of Knape Industries, Inc. located at 10701 Northland Drive, Rockford, MI 49341. The purpose of this inspection was to verify compliance with Permit to Install No. 26-97 and all other applicable air quality rules and regulations. KD arrived on site at approximately 10:45 am, and presented the Environmental Rights and Responsibilities pamphlet to Mr. William (Bill) Knape, President, who accompanied KD on the tour of the facility.

Facility Description:

Knape Industries, Inc. (Knape) is a finisher of plastic automotive parts, primarily automotive exterior lighting. Primary operations are coating parts, but other operations include pad printing, stamping, vacuum metalizing, silk screening, and conversion coating. The facility is small, operating one shift per day four (4) days a week, with an occasional half day on Friday, employing approximately 13 employees.

Regulatory Overview:

Knape currently holds one (1) permit, PTI No. 26-97, and is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plating and Polishing Operations (40 CFR Part 63 Subpart WWWW). AQD is not currently delegated to enforce this MACT, thus KD supplied Mr. Knape with a pertinent handout with further instructions for compliance with this MACT. Additionally, Knape is not subject to the new Boiler MACT regulations.

Much of the operations have been in existence since 1967, thus some of the equipment is considered grandfathered, in addition to some of the exemptions being utilized by Knape. Knape used to be a Rule 208a source, but has since changed to an Opt-Out permit, due to their potential to Emit (PTE) for VOC's. KD was able to observe all of the exempt operations throughout the facility. The pad printing operations are exempt from Rule 201 permitting under Rule 285 (l) (ix). The silk screening operations are exempt from Rule 201 permitting under Rule 287 (e). The stamping operations are exempt from Rule 201 permitting under Rule 285 (l) (i).

Compliance Evaluation:

Throughout the facility tour, KD was able to observe all of the emission units outlined in the permit: FG-VACUUM, FG-PAINTINGA, FG-PAINTINGB, FG-MASKWASHERS, and EU-BOILER. Each emission unit will be further discussed below. At the time of the inspection, all containers appeared to be closed and properly stored throughout the facility, and within the storage areas. Additionally, there appeared to be no observable changes to any of the stacks.

Knape has requested, and AQD approved, the use of manufacturers formulation data in lieu of Method 24. Since Knape uses over 200 different combinations for paint, Knape has supplied the top ten (10) coatings used throughout the facility. The appropriate MSDS's are attached.

FG-VACUUM:

Knape has three (3) vacuum metalizers that were installed prior to 1967, and are thus grandfathered.

FG-PAINTINGA and FG-PAINTINGB:

Knape has a total of sixteen (16) paint booths, eight (8) paint machines, and three (3) ovens located in the facility accounting from PAINTINGA and PAINTINGB. At the time of the inspection all booths, vents, ovens, and machines were clearly labeled. The booth sizes were variable, and only a few were in use at the time of the inspection. All booths appeared to have properly installed filters. According to Mr. Knape, the filters are changed daily, or on an as needed basis.

FG-MASKWASHERS:

Four (4) solvent based mask washers and two (2) solvent less mask-washers can be found in various locations throughout the facility. Methyl Ethyl Ketone (MEK) is the primary solvent utilized in these mask washers. KD was able to observe these during the inspection, and they were properly closed. Additionally, these washers are exempt from under Rule 281 (h).

EU-BOILER:

Knape has one (1) steam generating natural gas only 15 horse-power boiler for indirect process heating. This boiler was installed prior to 1967, and is exempt from Rule 201 permitting under Rule 282 (b)(i). This unit is also not subject to 40 CFR Part 63 Subpart JJJJJJ (6J).

Recordkeeping/Reporting:

Knape industries is required to keep various daily, monthly, and yearly usage and emission records for various coatings and solvents as outlined in PTI No. 26-97 Special Condition 9: d – j. At the time of the inspection, Knape Industries was unable to produce these records. A Violation Notice will be sent for Special Condition 9 d – j as found in PTI No. 26-97. Records will be requested, and subsequently reviewed when the data becomes available. Mr. Knape assured KD that the records will be completed, including all requirements for the facility to maintain the records on site for a period of five (5) years.

Compliance Determination:

Based on the information provided and on-site evaluation, Knape industries is non-compliant with PTI No. 26-97, and a Violation Notice will be issued.

NAME

Kaitlyn Davis

DATE

12/09/2015

SUPERVISOR

PAB