

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

N625945171

FACILITY: WHITEHALL PRODUCTS		SRN / ID: N6259
LOCATION: 1625 WARNER ST, WHITEHALL		DISTRICT: Grand Rapids
CITY: WHITEHALL		COUNTY: MUSKEGON
CONTACT: Tim Swainston , Purchasing and Inventory		ACTIVITY DATE: 07/11/2018
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY '18 on-site inspection to determine the facility's compliance status with applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD staff, Chris Robinson (CR) conducted a scheduled unannounced on-site inspection of Whitehall Products (Whitehall) on July 11, 2018, to determine compliance with applicable air rules and regulations. Whitehall is located at 1625 Warner Street, in Muskegon County, Michigan. CR met with Tim Swainston, Purchasing and Inventory, Brad Bruns, President and CEO, and Roger Buter, Chief Financial Officer at approximately 1:00 pm, presenting proper AQD credentials and announcing AQD's intent to conduct an inspection of the facility.

Weather Conditions were sunny with a temperature of approximately 85°F and east north-east winds with a speed of approximately 5mph. No odors or visible emissions were observed.

Facility Description

Whitehall manufactures metal outdoor decor. All the manufacturing of the items is completed at other locations and sent to this location for finishing. Most of the décor require some type of coating/s which include either powder and/or wet-coating.

Compliance Evaluation

There are no permits associated with this facility. In the past, Whitehall registered as a Rule 208A source, which required them to stay under 50% of major source threshold for all criteria pollutants and Hazardous Air Pollutants (HAPs) and were subject to MAERS reporting. In 2013 the AQD received Potential to Emit calculations indicating that the facility is a True Minor source. Therefore, no longer subject to 208A nor required to report to MAERS. Whitehall now operates under several exemptions which are discussed below.

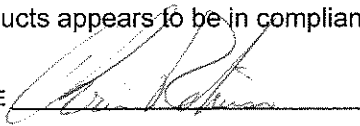
Whitehall operates one (1) manual batch powder coating booth and one (1) powder coating conveyor line. Filters were in place and appeared to be in good condition. Powder coating is used on parts that require a smooth finish and has replaced most of the wet coat operations since the previous inspection conducted on 12/9/2010. Infrared ovens are used to cure the powder coating. Powder coating booths and associated ovens appear to be exempt from Rule 201 permitting requirements under Rule 287(2)(d).

The facility has seven free standing manual wet spray booths, 4 of which are actively used. Each one has it's own individual exhaust stack vented externally through the roof of the building. Filters appeared to be in good condition. Staff indicated that the filters are typically changed weekly. In the past, all seven booths were considered to be one emission unit and considered exempt under Rule 290. However, with the switch to powder coating, Whitehall has opted to use Rule 287(2)(c) for surface coating lines that use no more than 200 gallons per month and include a dry filter. Monthly usage records for 2016 through 2018 were provided and are attached. Based on these records, monthly usage for the spray booths combined has been less than 100-gallons/month since at least January 2016.

The facility has a manual roll coating process for applying trim paint to raised surfaces such as the letters and numbers on metal address plates. This is considered its own emission unit, separate from the spray booths discussed above, and appears to be exempt from Rule 201 permitting requirements under Rule 287(2)(c) for surface coating lines that use no more than 200 gallons per month. Rule 287(2)(c)(ii) requires dry filter control for any exhaust system that serves only coating spray equipment. This coating is applied manually without spraying and is vented to the in-plant environment. Therefore, filter control is not required. As with the wet spray booths, this emission unit used to be covered under the Rule 290 exemption, but the facility has chosen to use Rule 287(2)(c) and has provided usage records, which are attached. Monthly usage records for 2016 through 2018 were provided and are attached. Based on these records, monthly usage for the roll coating operations has been less than 100-gallons/month since at least January 2016.

Compliance Determination

Based on the observations made at the time of this inspection and a subsequent record review, Whitehall Products appears to be in compliance with applicable air rules and regulations.

NAME 

DATE 7/27/2018

SUPERVISOR 