

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

N625968700

FACILITY: WHITEHALL PRODUCTS		SRN / ID: N6259
LOCATION: 1625 WARNER ST, WHITEHALL		DISTRICT: Grand Rapids
CITY: WHITEHALL		COUNTY: MUSKEGON
CONTACT:		ACTIVITY DATE: 07/27/2023
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On site inspection to assess compliance with air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Introduction

On July 27, 2023, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an on-site, unannounced inspection of the Whitehall Products facility located at 1625 Warner St. in Whitehall, Michigan, to assess compliance with all applicable air quality rules and regulations. Whitehall Products is a coating and finishing facility that coats metal products with wet or powder-based coatings. The metal products are manufactured at a different off-site facility. This facility has no active permits to install.

Prior to entry, SE conducted a perimeter inspection of the facility exterior. No visible emissions or odors were observed during this part of the inspection. After the exterior inspection was completed, SE entered the facility and was greeted by Brian Thomas. A brief discussion was held to explain the purpose of the day's visit. Afterwards, an inspection of the facility was conducted during which all production areas were visited.

Compliance Evaluation

This facility has no permits to install but has multiple pieces of equipment that have historically operated under various exemptions.

The facility has multiple powder coat booths that utilize infrared ovens to cure the applied coating. All units were equipped with appropriate filters and appeared to be exempt from permitting requirements under Rule 287(2)(d). It was explained that one unit is not currently in use, though it was still installed at the facility.

The facility has multiple wet spray booths for coating products as well as a manual roll-coating process for applying trim paint. Each was equipped with appropriate spray nozzle applicators and filters that were intact and installed properly. These units appeared to be exempt from permitting requirements under Rule 287(2)(c) as less than 100-gallons per month of coating are used at the facility. The facility provided records to demonstrate compliance with this exemption with the highest monthly usage in the past year being 30.8 gallons in May of 2023.

Changes regarding Part 6 rules were discussed with the facility. During a review of facility paint usage regarding these Part 6 rules changes, it was found that, while the facility would be classified as a facility subject to the updated Rule 621 as a surface coater of metallic parts, they meet the exception outlined in Rule 621(10) as their total emissions of Volatile Organic Compounds (VOCs) from all coating lines is less than 2000 pounds per year and 10 tons per year. This was determined through daily paint usage records provided by the facility. Rule 621(5) requires daily records be maintained and is not exempted by Rule 621(10). Since total VOC emissions are far below the

threshold, the facility is exempt from the rule. Therefore, at the time of this inspection there were no compliance issues.

Conclusion

At the conclusion of this inspection the facility appeared to be compliant with all applicable air quality rules and regulations.

NAME Scott Evans

DATE 8/23/2023

SUPERVISOR 