

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

N657830757

FACILITY: Almond Products Inc		SRN / ID: N6578
LOCATION: 17150 148th Ave, SPRING LAKE		DISTRICT: Grand Rapids
CITY: SPRING LAKE		COUNTY: OTTAWA
CONTACT: Kim Cooper , Environmental/Lab Supervisor		ACTIVITY DATE: 08/06/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility at approximately 10:00 AM to conduct an unannounced scheduled inspection.

Staff signed in and called Kim Cooper, Environmental/Lab Supervisor who saw me right away. Ms. Cooper was offered the DEQ Environmental Inspections: Rights and Responsibilities brochure, which has not changed since the last inspection.

#### FACILITY DESCRIPTION

Almond Products is a coater of miscellaneous metal parts. It is currently operating under Opt-out permit No. 361-06D along with permit 340-08C for a fluidized bed sand stripper. Existing operations include two dip lines, an anodize/alodine line, four spray booths and a powder coating line.

#### COMPLIANCE EVALUATION

##### EUDIPLINE1

This line was in operation during the inspection. It consists of various tanks for cleaning/rinse, complex oxide and two for dip coating. The line also has curing ovens and a cool down section. The line is controlled by a thermal oxidizer.

#### I. EMISSION LIMITS

The emission limit values were determined from the attached records.

S.C.I.1: Limits VOC emissions to 75.0 tons per 12-month rolling time period. Reported emissions May 2014 through June 2015 are 12.54 tons.

S.C.I.2: Limits VOC emissions to 410.8 lb/day on a calendar day average. Currently, as agreed upon with a previous AQD inspector the facility is using 85% control efficiency. The average reported controlled emission during the time frame evaluated was 122 lbs.

S.C.I.3: Limits VOC emissions to 6.7 lb/gal (minus water) as applied, prior to control. This line is consistent and the contents of the tank are closely monitored. The company utilizes an 80:20 mix ratio for the coating and additive.

#### II. MATERIAL LIMITS

NA

#### III. PROCESS/OPERATIONAL LIMITS

S.C.III.1: The permittee appeared to be appropriately capturing waste.

S.C.III.2: Observed containers were covered while in use at the time of the inspection

S.C.III.3a-c: The data required by the MAP has been received. The facility has implemented and maintained a MAP.

#### IV. DESIGN/EQUIPMENT PARAMETERS

S.C.IV.1: Requires proper operation of the thermal oxidizer, including temperatures above 1,400 °F and 85% destruction efficiency. At the time of the inspection, the paper recorder and digital display appeared to be equivalent. The temperature was 1,414°F at the time of the inspection. Ms. Cooper indicated that they had taken my advice and increased the set point slightly in order to ensure continued compliance. A review of past strip charts (attached) indicate compliance.

#### V. TESTING/SAMPLING

S.C.V.1: The permittee has received approval for using manufacturer's formulation data.

#### VI. MONITORING/RECORDKEEPING

S.C.VI.1: The permittee has records in a format acceptable.

S.C.VI.2: The permittee has continuously monitored temperatures of the thermal oxidizer.

S.C.VI.3: The permittee has been working on maintaining a current list.

S.C.VI.4a-e: The required records are being maintained.

S.C.VI.5: The facility maintains all strip chart records for the thermal oxidizer as required.

#### VII. NA

#### VIII. STACK/VENT RESTRICTIONS

S.C.VII.1: There have been no changes.

#### OTHER REQUIREMENTS

#### IX. NA

EUDIPLINE1 appeared to be in compliance at the time of the inspection.

#### EUDIPLINE2

This emission unit is in operation, however it is only utilizing low VOC water based coating at this time. The 18 months allowed to install equipment as originally permitted has passed, so a new review should be conducted before any solvent coating that is allowed by this permit is conducted. Ms. Cooper mentioned that Almond will soon be making changes to this line and a permit application is in the works. An application to modify this line was received in Grand Rapids on August 14, 2015.

#### EMISSION LIMITS

S.C.I.1: Limits VOC emissions from the line are limited to 21.8 tons per year. The facility currently is reporting 0.95 tons.

S.C.I.2: Limits VOC emissions to 161.3 lbs/day.

#### MATERIAL LIMITS

#### NA

## PROCESS/OPERATIONAL RESTRICTIONS

S.C.III.1: Staff did not observe incorrectly stored waste.

S.C.III.2: Observed containers were covered while in use at the time of the inspection.

S.C.III.3: No odors were observed in the room. It is additionally noted, that this condition is required for solvent based coating use.

S.C.III.4.a-c: The facility has implemented and maintained a MAP.

## DESIGN/EQUIPMENT PARAMETERS

S.C.IV.1 & 2: No solvent coating is in use so this condition does not apply.

## TESTING/SAMPLING

S.C.V.1: Permittee has received approval for using manufacturer's formulation data.

S.C.V.2: Trial operation has not commenced for solvent coating use, therefore this condition does not apply.

## MONITORING/RECORDKEEPING

S.C.VI.1&2: Permittee is not operating the thermal oxidizer so this does not apply.

S.C.VI.3: Permittee is using an acceptable record format.

S.C.VI.4: Permittee has been working on maintaining a current list.

S.C.VI.5.a: Permittee is maintaining record of gallons used.

S.C.VI.5.b: This is being done.

S.C.VI.6.a-c: This appears correct.

S.C.VI.7: No NDO records need to be kept currently.

S.C.VI.8: No thermal oxidizer records are being generated as it is not in use.

S.C.V.III.1: The stack is as installed.

EUDIPLINE2 appeared to be in compliance at the time of the inspection.

## EU COATING

This area contains four booths two prime and two topcoat, the majority of coating done consists of extreme performance coatings; however clear coatings were applied in 3 of the past 12 months. The mix area looked fine, and no open solvent or paint containers were noted.

## EMISSION LIMITS

The emission limit values were determined from the attached records.

S.C.I.1: VOC and acetone combined limit 50 tpy on a 12-month rolling time period. Reported emissions through June 2015 are 24.42 tons.

S.C.I.2: VOC and exempt solvents combined daily emissions limit 1044 lb/day. Recordkeeping does not indicate any exceedance of this limit.

S.C.I.3: Combined dibasic esters limited to 2.37 tpy. Current reported usage through June of 2015 is 0.090 tons.

S.C.I.4: VOC's in clear coats limited to 4.3 lb/gal on a volume weighted daily average. Based on the records provided this has been met.

S.C.I.5: VOC's in extreme performance coatings limited to 3.5 lb/gal on a volume weighted daily average. The records provided indicate compliance.

## MATERIAL LIMITS

S.C.II.1: This appears to have been met.

S.C.II.2: The facility is limited to 27,000 gallons of tan topcoat (F93H112 new tan). This was replaced with the F93H112, and that has been replaced by the Hentzen 08609TUZ-GD Tan. The facility is aware that any coating changes require a Rule 285 meaningful change demonstration prior to making the change.

#### PROCESS/OPERATIONAL RESTRICTIONS

S.C.III.1: The permittee appeared to be appropriately capturing waste.

S.C.III.2: Staff did not observe a filter change.

S.C.III.3: Observed containers were covered while in use at the time of the inspection.

#### DESIGN/EQUIPMENT PARAMETERS

S.C.IV.1: The appeared to be appropriately maintained

S.C.IV.2: The facility is using both HVLP and electrostatic spray guns.

#### TESTING/SAMPLING

S.C.V.1: The permittee has written approval to utilize manufacturer's formulation data for VOC emissions.

#### MONITORING/RECORDKEEPING

S.C.VI.1: The permittee is completing required calculations by the 15<sup>th</sup> of the month.

S.C.VI.2: Permittee has been working on maintaining a current list.

S.C.VI.3a-i: The permittee is currently meeting all requirements. See attached records.

S.C.VI.4.a: The permittee only uses one coating that contains dibasic ester, the F59A.

S.C.VI.4.b: The permittee does not reclaim.

S.C.VI.4.c: This information has been provided.

S.C.VI.4.d-e: This information is maintained.

#### REPORTING

S.C.VII.1: No change in land use has occurred.

#### STACK/VENT RESTRICTIONS

S.C.VIII.1-5: A roof inspection was not conducted during this site visit. Visual observation from the outside did not indicate any changes in stack configuration.

EU COATING appeared to be in compliance at the time of the inspection.

#### EUANOD/ALOD

The facility has made some modifications to this line which was reviewed in July of 2014.

#### EMISSION AND MATERIAL LIMITS

S.C.I-II: NA

#### PROCESS/OPERATIONAL RESTRICTIONS

S.C.III.1: The permittee appeared to be appropriately capturing waste.

S.C.III.2: Containers were covered when not in use at the time of the inspection.  
S.C.III.3.a-c: The facility has implemented and maintained a MAP.

#### DESIGN/EQUIPMENT PARAMETERS

S.C.IV.1: The fume scrubber appeared to be installed and operating properly.

V-IX: NA

EUANOD/ALOD appeared to be in compliance at the time of the inspection.

#### FGFACILITY

#### EMISSION LIMITS

S.C.I.1: Limits each individual HAP to less than 9.0 tons per 12-month rolling time period. Reported highest individual HAP was hydrogen fluoride at 1.8 tons.

S.C.I.2: Limits aggregate HAPs to less than 22.5 tons per 12-month rolling time period. Reported aggregate HAPs are 5.73.

S.C.I.3: Limits VOCs to less than 90.0 tons per 12-month rolling time period. Reported VOC emissions are 34.276 tons.

S.C.V.1: The permittee appears to be accurately accounting for HAP contents.

S.C.V.2: The permittee has written approval to utilize manufacturer's formulation data for VOC emissions.

S.C.VI.1: The permittee is completing required calculations by the 15<sup>th</sup> of the month.

S.C.VI.2.a-e: The permittee appears to be properly maintaining HAP records.

S.C.VI.3.a-e: The permittee appears to be properly maintaining VOC records.

#### PTI No. 340-08C EUSANDSTRIPPER

EUSANDSTRIPPER was stack tested in January of 2014. No formal review of the results was conducted by TPU, however the results indicated compliance with the emission limits. Pollution control equipment is a secondary afterburner and a ceramic element filter particulate control.

#### I. EMISSION LIMITS

Emission limits are established for PM, PM10, PM2.5, hydrogen chloride and hydrogen fluoride. Stack testing is the basis of compliance for the hourly limits. Stack testing for HCl and HF was conducted and indicates compliance with no lime injection.

#### II. MATERIAL LIMITS

The permittee is required to keep track of batches that contain chromium compounds, manganese compounds and epoxy resins separately. This is being done. Chromium containing batches are limited to 1,095 and reported batches are 359. Manganese containing batches are limited to 1,095 and reported batches are zero. Epoxy containing batches are limited to 1,870 and reported batches are 663. PTFE containing batches are limited to 1,560 and reported batches are 1,306.

#### III. PROCESS/OPERATIONAL RESTRICTIONS

S.C. III.1: Requires the implementation of a MAP. A MAP has been implemented.

S.C.III.2-3: The unit appears to be properly utilized.

#### IV. DESIGN/EQUIPMENT PARAMETERS

S.C. IV.1-4: Requires proper operation for the unit and control equipment, including maintaining the afterburner at 1,560 °F (+/- 50 °F) and operating the system in a satisfactory manner in accordance with an approved MAP. Temperature records indicate all temperatures remained above 1,560 °F. Ms. Cooper asked if Almond can go higher in temperature than 1,610 °F and I stated I would clarify that it is ok to go above that. Before making any changes Almond should ensure that no damage will occur to the ceramic particulate control at a higher temperature.

#### V. TESTING/SAMPLING

Testing was conducted and found sufficient.

#### VI. MONITORING/RECORDKEEPING

The permittee is maintaining records as required.

EUSANDSTRIPPER was in compliance at the time of the inspection.

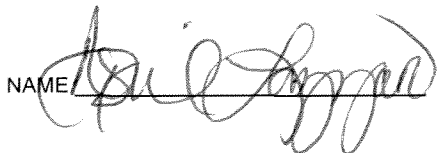
Consent Order AQD No. 12-2013

Due to compliance with the permit conditions as identified above, Almond is in compliance with the consent order.

#### SUMMARY

Almond Products, Inc. was in compliance at the time of the inspection.

NAME



DATE

8-24-15

SUPERVISOR

PAB