

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

N753370907

FACILITY: NORTHERN LIGHT REFINISHING INC		SRN / ID: N7533
LOCATION: 157 BEECH ST, CEDAR SPRINGS		DISTRICT: Grand Rapids
CITY: CEDAR SPRINGS		COUNTY: KENT
CONTACT: JD Fallinek , Core Buyer Manager		ACTIVITY DATE: 01/23/2024
STAFF: Dillon King	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Dillon King (DK) and Clayton DeRonne (CD) arrived at the Northern Light Refinishing (SRN: N7533) facility at 1:20 pm on January 23, 2024 to complete an unannounced, scheduled inspection

Prior to entering the facility visible emission and odor observations were completed. No odor or visible emissions were observed. The weather conditions were light rain, 34° F with a E wind at 8 mph.

Upon entering the facility, DK and CD met with Mr. JD Maltinek, Core Buyer Manager, who escorted AQD staff through the facility, and provided records and information regarding site operations.

#### Facility Description

Northern Light Refinishing (NLR) is a remanufacturer of automotive lights and their housings. The facility receives lights and housings from auto salvage yards, refurbishes them, and resells them in the aftermarket. The facility operates a coating line under general Permit-to-Install (PTI) No. 262-05. The facility operates one 10-hour shift each day Monday through Thursday and currently has 32 employees. Since the last inspection in 2018, the facility has gotten rid of the plastic mold injection equipment.

#### Compliance Evaluation

##### PTI No. 262-05, FG-COATING

This flexible group is for one or more coating lines and all associated purge, clean-up, flash-off, drying areas and oven operations. Two paint booths were observed during the walk through, and both utilize fabric filters to control emissions. No additional emission control equipment is being utilized. The main paint booth was not in operation during the inspection, but facility staff powered up the booth and AQD staff was able to verify operating parameters. The dry filters appeared in good condition upon inspection and the magnehelic gauge on the paint booth showed a differential pressure measurement of 0.07 inches of water column (in H<sub>2</sub>O) with an acceptable range of 0.035 to 0.2 in H<sub>2</sub>O. The oven associated with the main paint booth is heated to 130°F during operation.

The second paint booth is in the packaging area and used to perform touchups prior to preparations for shipment. The second paint booth was in operation during the inspection. The filters appeared in good condition and the magnehelic gauge on the paint booth showed a differential pressure measurement of 0.14 inches of water column (in H<sub>2</sub>O) with an acceptable

range of 0.035 to 0.2 in H<sub>2</sub>O. There is no oven associated with the packaging paint booth. The stacks for the paint booths were observed and are vented vertically unobstructed.

Conditions in the permit require the facility to keep records for all purge/clean-up solvents and coatings from all coating operations, store them in closed containers, and dispose of them in an acceptable manner in compliance with all applicable state rules and federal regulations. There are also requirements in the permit that the facility use high volume-low pressure (HVLP) spray applicators. Based on the observations at the time of the inspection, the facility is in compliance with these conditions.

The applicable emission limits at for the flexible group are 2000 pounds per month of Volatile Organic Compounds (VOCs) for each coating line plus all associated purge and clean-up operations and 10 tons per year (tpy) of VOCs based on a 12-month rolling time period as determined at the end of each calendar month. Monthly and 12-month rolling total emission records were reviewed going back to January 2023. There were errors with how the usage of cleaning material designated "Keystone 5G\_5" is being recorded. It appears that the number entered into the "Cleaning Material Used (Gallons)" column is actually the number of 5-gallon buckets of material used and does not accurately reflect material usage in gallons. This was corroborated by purchase order records and confirmed by the JD during discussion. Corrected records were requested and received from the company on February 28, 2024. For the year 2023, the highest 12-month rolling total for VOC emission was 0.39 tpy (June 2023) and the highest monthly emissions was 95.86 lbs (August 2023). These results are well below the permitted limits.

Stack heights for each paint booth are required to be a minimum of 1 ½ times the building height. Though not directly measured, the stacks appear to meet this requirement.

PTI No. 262-05, FG-SOURCE

This flexible group is for all coating lines and all associated purge and clean up operations at the stationary source. The group is subject to a VOC emission limit of 30 tpy based on a 12-month rolling time period as determined at the end of each calendar month. Based on records reviewed, NLR is in compliance with the limit.

#### Rule 201 Permitting Exemptions

A sanding area was observed with emissions controlled by a dust collector and vented internally and appears to be exempt per Rule 285(2)(l)(vi)(B).

#### Conclusion

Based on the review of the records provided and the observations made at the time of the inspection, NLR appears to be in compliance with PTI No. 262-05 and any other applicable air quality rules and regulations.

NAME

Dick A. King

DATE 3/5/24

SUPERVISOR

[Signature]