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

N762735158

FACILITY: KNAPHEIDE TRUCK EQUIPMENT CO		SRN / ID: N7627
LOCATION: 1200 S AVERILL, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Dean Powell , Process Improvement Engineer		ACTIVITY DATE: 06/08/2016
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection to determine compliance with PTI 187-06.		
RESOLVED COMPLAINTS:		

Inspection Report

N7627- Knapheide Truck
1200 S. Averill Road, Flint, MI 48503

Inspection Date:
6/8/16

Facility Contacts:

Dean Powell, Process Improvement Engineer, 810-762-1135, dpowell@knapheide.com
Kris Spleet, Office Manager, 810-762-1115, kspleet@knapheide.com

MDEQ AQD Personnel:

Nathan Hude – huden@michigan.gov, 517-284-6779

Facility Description:

Knapheide Truck Equipment Company is a facility that specializes in aftermarket work vehicle accessories. This includes truck work boxes that replace stock truck beds, dump truck bodies, lift gates, and snow plows. This site has over 7 service bays to perform work and also has 2 coating booths for customer specific paint color requests.

Common work shifts are Monday-Friday 8am-5pm and some Saturdays dependent on work load with an estimated employee count of 75 individuals total.

Applicable Regulations:

-General PTI 187-06 for Coating Line emitting up to 10 tpy VOC
-40CFR63 HHHHHH- Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, does apply per paragraphs 63.11169(b) and 63.11170(a)(2), yet delegation to the state of Michigan has not been given by US EPA

40CFR63 IIII does not apply due to not being a facility that coats “new automobiles or new light duty truck bodies” per paragraph 63.3081(b)

40CFR60 MM does not apply due to the facility not being a “automobile or light-duty truck assembly plant” per paragraph 60.390(a).

Previous Inspections:

none

Previous Violations:

none

Violations Found During this Inspection including reoccurring:

none

Recent Complaints (within 2 years):

none

MAERS Reporting

NO- Due to being subject to 40CFR63 HHHHHH, Knapheide is technically a Category III MAERS facility. Yet the annual emission of VOC is in terms of permitted and actual emissions, lower than 10tpy. IAW DEQ Policy AQD-013, due to actual emissions expectations of less than 10tpy, Knapheide will not be required to report.

MAERS Emission Unit List

none

Inspection Summary

I arrived at Knapheide around 9:30am and entered through the showroom area. Upon driving into the facility parking lot and entering the building, I did not detect any odors or observe any visible emissions.

I introduced myself to the receptionist and informed her of the purpose of my visit. She proceeded to call Dean to assist me with my inspection. I provided Dean with a copy of the Inspection Brochure and my business card while I informed him of the purpose of my visit. We discussed the brochure contents and I reviewed the inspection procedure. We quickly looked at the PTI and I explained that I would be reviewing the conditions during the inspection for compliance determination. PTI 187-06 was issued on June 27, 2006 as a general permit for coating lines emitting up to 10 tpy VOC's.

We first started the inspection at the coating booth area. Knapheide has 2 coating booths in total. The booths are not controlled by a thermal oxidizer, so permit paragraphs IV.3-5, VI1-2 and 5-7 do not apply. The coating booths are located on the north side of the building. The paint booths have overhead doors with the particulate control filters in the floor. Maintenance on the booth filters is conducted by a Knapheide employee Mike Leitz who is the Technical Support Specialist. Both booths have a magnehelic gauge installed which is used for determining when a filter change is needed to occur. I confirmed that filters were installed in both booths thus fulfilling the requirements of permit paragraph IV2.

The paint room was a small room where the paint is mixed to specific quantities per color matching requirements. I would estimate that the room maybe contained a maximum of 400 gallons of paint given the quantity of quart sized containers and 50 gallon drums. I received MSDS copies for the three most common paints used, labels containing the paint name and VOC content are also printed from a database inventory system every time paint is used. Spray gun test caps were not available at the facility; though Mike Leitz agreed to order them asap and provide proof of receipt.

Knapheide also has a prep area that completes grinding and minor repairs in preparation for installing accessories. There is a room with an estimated space for 6 vehicles and vacuum hoses hooked up to the grinders which is sucked to a 30 gallon drum with a filter. Post filter air is vented to the outside. A view of the ductwork leading outside shows that some PM was not captured in the past. I discussed this with Dean so that he was aware of my concern and informed him that no PM should be escaping this device. Dean stated that he would add more details to the maintenance checklist being used to ensure PM does not escape. This area is exempt per Rule 285(l)(vi) which requires filtration for externally vented emissions. According to Dean, the filter is changed as needed based on suction capability at the work stations.

Dean and I then walked back to the office area where I provided him a copy of our exception booklet and I explained rules 285(l)(vi) as it pertained to their prep area where dents are repaired and grinding is completed. We also discussed the record keeping requirements as listed in the PTI. Kris is the individual responsible for the recordkeeping and was currently unavailable, so I showed Dean where he could locate an electronic copy of the latest general permit.

When Kris was available we began our discussion about the recordkeeping requirement. The records were a couple of months behind due to issues with the spreadsheet used per Kris. I allowed for updates and electronic submittal NLT June 13th. Based on the sheets that were updated and current, the intent of the record keeping requirements was being met as per permit paragraph VI3. The annual VOC calculated emission was a total of approx. 10,000 lbs or 5 tons thus meeting the limit of 10tpy for each booth and 30 tpy for the facility. The monthly limit of 2000 lbs/month VOC was well under with a calculated maximum of 1237lbs in November of 2015. I received an updated copy of the spreadsheet via email on Friday June 10. Minor issues were noted with the spreadsheet, yet I was able to confirm compliance with the permit requirements.

I departed the facility after completing a closing meeting with Dean on my findings; overall, the shop was very clean and all filters inspected looked to be recently installed and well kept.

Upon returning to the office and drafting this report, I provided notification to Dean and Kris of the applicability of 40CFR63 HHHHHH Nation Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources was given to the company via email on June 24, 2016. Due to the state of Michigan not being granted delegation of this regulation, the inspection did not identify the specific requirements for compliance. I encourage you to research this regulation to determine if there are conditions of compliance or requirements of your facility that are required to be reported to US EPA.

Proof of the receipt of test caps was received on June 24, 2016 thus showing compliance with permit paragraph IV1.

NAME



DATE

6/24/16

SUPERVISOR



