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

P060535425		
FACILITY: Premier Finishing, Inc.		SRN / ID: P0605
LOCATION: 3682 Northridge Avenue NW, Suite 10, WALKER		DISTRICT: Grand Rapids
CITY: WALKER		COUNTY: KENT
CONTACT: Andy Ribbens , President		ACTIVITY DATE: 07/07/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this Regulations.	inspection was to determine compliance with PTI No. 77	-15 and all other applicable Air Quality Rules and
RESOLVED COMPLAINTS:		

On Thursday July 7, 2016 AQD Staff Kaitlyn DeVries (KD) and Chris Robinson (CR) conducted an unannounced, scheduled inspection of Premier Finishing Inc. located at 3180 Fruit Ridge Ave and 3382 Northridge Ave NW, Suite 10, both in Walker Michigan. The purpose of this inspection was to determine compliance with PTI No. 77-15 and all other applicable Air Quality Rules and Regulations.

Staff arrived at the Northridge location at approximately 1:30 pm. Staff spoke with an employee on site who stated that Mr. Andy Ribbens, President, was at the other location. Staff proceeded to the Fruit Ridge site and met with Mr. Ribbens and Mr. Joe Vander Meulen. KD presented Mr. Ribbens with the Environmental Rights and Responsibilities pamphlet, which was discussed.

KD asked about the Fruit Ridge location, and what was housed here, as only permitted equipment was for the Northridge facility, that houses the anodizing line. The Fruit Ridge facility houses all of the other operations, including parts washing, Black Oxide conversion coating, Passivation, Rust Removal, and Vibratory Deburring. At that time, KD also requested to have a tour of this facility in addition to the anodizing line at the Northridge facility. The tour of the facility started with the Fruit Ridge facility and then proceeded to the Northridge facility. After the closing meeting, AQD staff left the site at approximately 3:00 pm. **Facility Description**

Premier Finishing cleans and finishes various parts for the manufacturing community. Utilizing DEQ Policy and Procedure 11, it was determined that the two (2) buildings are indeed one (1) stationary source, and will be evaluated together.

Regulatory Analysis

Premier Finishing is a minor source that currently only has the one (1) permit, PTI No. 77-15 for the anodizing line in the Northridge Facility.

Compliance Evaluation

The only process in the Fruit Ridge facility that is emitted to the ambient air is the black oxide conversion coating line. All of the other processes (parts washing, passivation, rust removal, and deburring are emitted to the general in-plant environment. All of these processes are a metal surface treatment process used for cleaning, and are exempt from Rule 201 permitting under Rule 285 (r)(vi).

The black oxide process, however, uses several rinsing baths and acid baths. The acid baths (muriatic acid, phosphoric acid, and citric acid) are vented externally without any control. MSDS's for the acids used in this process are attached to this report. MSDS's for the other cleaning products are also attached to this report. This process may be exempt from Rule 201 permitting, but would require records to utilize rule 290. Since no records were available, this is a violation of Rule 201. A Violation Notice will be sent.

FGFUMESCRUBBER

This flexible group includes the aluminum anodizing line consisting of 21 process tanks. Three (3) tanks are vented to the ambient air via a fume scrubber system, the caustic etch (EUCAUSTICETCH) and two (2) anodizing tanks (EUANODIZE1 and EUANODIZE2). All other process tanks and rinse tanks are vented to the in-plant environment.

Premier Finishing submitted a Malfunction Abatement Plan (MAP) within the allowed 60 days of issuance of the permit. Mr. Ribbens showed staff the spare parts, and also indicated that they were tracking the pH of the

scrubber in addition to the required pressure drop. The magnehelic for the scrubber is placed in a location that is readily viewable for the employees operating the anodizing line. At the time of the inspection, the pressure drop across the scrubber system was 0.8 inches of water. Premier finishing is properly tracking the pressure drop for the scrubber; however, Mr. Vander Meulen explained to KD that they had a malfunction in the recordkeeping device and did not have any records of the pressure drop for the months of April and May. Per their permit, they are only required to take record the pressure drop monthly, thus they are missing two (2) entries. While this is technically a violation, the available records indicate compliance, thus, this will not be cited at this time Records are attached.

Finally, neither facility had any boilers, generators or cold cleaners.

Compliance Determination

Based on the observations made during the inspection and a subsequent review of the records, it appears as if Premier Finishing is not in compliance with all other applicable Air Quality Rules and Regulations. A Violation Notice will be sent for Rule 201.

NAME Kattlyn Dolin

DATE 7/25/2016 SUPERVISOR #02