

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

P061652424

FACILITY: Lakeland Monroe Group		SRN / ID: P0616
LOCATION: 4490 44th Street SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Norm Day , Director of Operations		ACTIVITY DATE: 02/12/2020
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Norm Day, Director of Operations. Mr. Day was available to provide information on facility operations, as well as a tour.

FACILITY DESCRIPTION

Lakeland Monroe Group manufactures gauge pointers and components for automotive gauges and dashboards. The majority of operations consist of plastic injection molding the parts as needed for the equipment listed above. In addition, there is a hand spray paint booth as well as a robotic spray booth. The facility operates pursuant to Opt-out Permit to Install (PTI) No. 105-15, which includes limits on the booths as well as facility wide limits of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

COMPLIANCE EVALUATION

PTI No. 105-15

FGPaint

This flexible group includes EUAutoPaint and EUTableBooth, both of which utilize dry filters for particulate control and two electric IR flash ovens.

VOCs are limited to 29.0 tons per 12-month rolling time period as determined at the end of each calendar month. Reported VOC emissions for the 12-month time frame of January-December 2019 are reported at 2.71 tons. Emissions of xylene are limited to 103.6 pounds/day. The highest amount of xylene used in a month was 44.216 pounds. While the maximum emissions for the month are less than the daily limit, the company should ensure that they are reporting the actual pounds per day used, not the monthly usage divided by 365. The intent of the daily limit is to know the actual amount of emissions generated on a per day basis.

I observed the paint and solvent storage area and it was well maintained. Wastes appeared to be stored appropriately. Mr. Day confirmed that the booths are equipped with HVLP guns, and one set of dry filters is used in each booth to reduce particulate emissions.

The booths are currently used one to two days per month as they utilize a different facility to conduct most of their painting. However, by chance they were painting during the inspection and I observed a well ran and clean operation.

Recordkeeping is maintained by coating and VOC and HAPs separately on a per month basis. The records did not include a 12-month rolling total, however based on usage and reported monthly emissions, I was able to determine compliance with the limits for the previous two years. Additionally, a detailed listing of chemical composition is being maintained. Discussions with the facility are noted below and recordkeeping is attached.

The stacks have not changed since installation.

FGFacility

This flexible group contains facility-wide conditions limiting individual HAP emissions to 9.0 tons based on a 12-month rolling time period. The highest reported facility-wide emissions of HAP is from xylene. Reported emissions of xylene for the 12-month time frame of January-December 2019 are 0.0732 tons.

Aggregate HAPs are limited to 22.5 tons per 12-month rolling time period. The total reported facility-

wide aggregate HAPs for the 12-month time frame of January-December 2019 are 2.21 tons. This number likely represents overreporting as I noted that items included in the total that are not HAPs. The company needs to report HAPs on a 12-month rolling basis separate from VOC.

VOC emissions are limited to 29.0 tons per 12-month rolling time period. The total reported 12-month rolling facility-wide VOC emissions for the time frame of January-December 2019 are 3.1 tons.

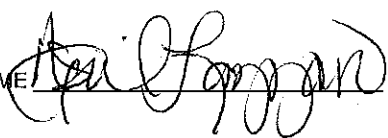
A pad print machine is used, and the company has identified it as exempt per Rule 287(2)(c). The maximum reported monthly usage in 2019 was 0.16 gallons, which indicates compliance with the 200 gallon limit.

The only information missing is that there is not a 12-month rolling total emissions total in the spreadsheet. I sent an email to Joan Schultes, Quality Systems Engineer responsible for the facility emissions recordkeeping. I provided Ms. Schultes with the AQD spreadsheet that includes formulas that demonstrate how a 12-month rolling average is to be computed. Ms. Schultes responded and included the 12-month rolling data for VOCs. She is also preparing the HAPs data. As previously indicated due to the very low paint usage at the facility, and the fact that the line operates two days a month, I was able to determine compliance with the limits for the previous two years due to the detail in the existing recordkeeping which is attached. Reported emissions are below the limits. Per Ms. Schultes, this information will be included in the standard recordkeeping going forward.

COMPLIANCE EVALUATION

Lakeland Monroe Group was in compliance at the time of the inspection.

NAME



DATE

2-26-20

SUPERVISOR

