

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

P084541502

FACILITY: Best Metal Products Company		SRN / ID: P0845
LOCATION: 3570 Raleigh Drive SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Kurt Skov , Engineering Manager		ACTIVITY DATE: 09/15/2017
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 10:35 A.M. on September 15, 2017, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced inspection of Best Metal Products Company located at 3570 Raleigh in Cascade Township. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. Accompanying AQD staff on the inspection was Kurt Slov, Engineering Manager. Bob Doornbos, President provided follow-up information.

FACILITY DESCRIPTION

Best Metal Products manufactures custom hydraulic cylinders. The company has various metal machining and welding operations and has one painting spray paint booth. The facility operates two shifts and employs approximately 100 people. This facility can be considered a true minor source of volatile organic compound (VOC) emissions.

COMPLIANCE EVALUATION

Machining and Welding Operations:

The inspection started at the beginning of the manufacturing process to the end. Essentially there are various metal machining operations throughout the process that are vented to the in-plant environment. These units can be considered exempt from air use permitting under Rule 285(2)(l)(vi)(B).

In addition, the company has approximately 12 welding stations, all of which are either ducted to a Torit baghouse or a backdraft hood with filter. All collectors are vented into the plant environment. All welding stations are exempt from air use permitting under Rule 285(2)(i). It is noted that welding operations used to be conducted in the southeast corner of the building and were exhausted out of the plant. Although the ductwork still exists, it has been flanged off and no equipment is installed in that area.

Paint Spray Booth:

The company has one paint spray booth used to apply solvent-based primer and some topcoat to the final hydraulic cylinder. Additional information provided by the company shows that the booth was installed in 1983. Paint is sprayed from pressure pots with Binks Trophy Series high volume low pressure (HVLP) applicators. Parts are air-dried. Filters were installed in the booth and looked well maintained. It is noted that the paint line was not operating at the time of the inspection. Mr. Slov indicated that the stack to the booth was raised in the last two years and was evaluated by Cascade Township.

The company uses enamel, lacquer and alkyd coatings as mixed by the coating supplier. No additional reducing solvents are added at the facility. Mr. Slov stated that mostly white primer is used and that the customer will complete the finish topcoat. According to company records, a small amount of xylene is used on occasion to remove paint; for September 2016 through August 2017, 20 gallons were used.

At the time of the inspection Mr. Skov provided a spreadsheet that identified coating usage and VOC emissions. However, it was apparent that the spreadsheet was not updated. It is also noted that the company had prepared an opt-out permit application for limiting VOC and HAP emissions, however, there is no record that this was submitted to AQD. Further documentation provided by Mr. Doornbos demonstrated that the paint booth could be considered exempt from air use permitting under Rule 287(2)(c) because monthly coating usage was below 200 gallons per month (records are attached in AQD files).

Also, Environmental Data Sheets were provided for all coatings. The highest VOC content of the applied coatings is 5.8 pounds of VOC per gallon of coating. Based on a limitation of 200 gallons per month and a worst case VOC content of 5.8 lbs/gallon, the estimated potential to emit of VOC from the paint booth is 6.96 tons which would make the facility a true minor source for VOCs. Correspondingly, the facility appears to be a true minor source with respect to individual and combined hazardous air pollutant (HAP) emissions, however the company

should conduct a full analysis of HAP emissions to verify potential emissions.

EVALUATION SUMMARY

Best Metal Products appears to be in compliance with the applicable requirements evaluated. Coating usage and data sheets are attached.

NAME *[Signature]*

DATE 9/29/17

SUPERVISOR *[Signature]*