

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

P084568505

FACILITY: Best Metal Products	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: 07/25/2023
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance
SUBJECT: Unannounced, scheduled inspection.	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

Air Quality Division (AQD) staff April Lazzaro conducted an unannounced inspection of Best Metal Products located at 3570 Raleigh in Grand Rapids. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. No odors or visible emissions were noted around the facility. Accompanying AQD staff on the inspection was Noel Dreyer, Maintenance Manager as Kurt Slov, Engineering Manager was out of the office.

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 one 10 hour shift and employs approximately 100 people.

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).

Heated Wash System:

The company operates a heated, internally vented wash station that utilized a soap-like product free of volatile organic compounds (VOC). The safety data sheet was reviewed to confirm this. This unit is exempt from air use permitting per Rule 281(2)(k).

Paint Spray Booth:

The company has one paint spray booth used to apply solvent-based primer and some topcoat to the final hydraulic cylinder. Previously, information provided by the company found that the booth was installed in 1983, and no changes have been made. Paint is sprayed from pressure pots with Binks Trophy Series high volume low pressure (HVLP) applicators. Parts are air-dried on a conveyor system. Filters were installed in the booth and looked well maintained. During the last inspection in

2017, the Rule 287(2)(c) air use permit exemption was deemed appropriate for the booth. Mr. Skov indicated there has been no increases in production since the last inspection.

The company uses enamel, lacquer and alkyd coatings as mixed by the coating supplier. No additional reducing solvents are added at the facility. The company recently changed paint suppliers and receive all paints pre-mixed in five (5) gallon containers.

Upon his return to the office, Mr. Skov provided a document that identified coating purchase records. However, due to the recent coating changes, and the need to stock up on some items, it shows that usage is above the 200 gallons per month allowed by the Rule 287(2)(c) exemption for several months, while other months are below that value. Following a discussion with Mr. Skov, he requested a couple weeks to pin down the typical monthly usage, and confirm that with the new coatings, it is below the 200 gallons per month as expected. Mr. Skov also indicated that the volatile organic compound content for the new primer (highest volume coating) is around 3 lb/gallon which appears lower than the previous coatings used. The AQD guidance document on Rule 287(2)(c) was provided to Mr. Skov via email for review and use as applicable.

While the Rule 287(2)(c) exemption does not include flush solvent, I noted to Mr. Skov that they appear to be using a drum of methyl ethyl ketone (MEK) which he stated is used as a line and gun flush during color changes. This usage was discussed, and it was suggested that they analyze the flush process to identify if reductions could be made.

EVALUATION SUMMARY

Best Metal Products appears to be in compliance with the applicable requirements evaluated. If additional information indicates otherwise this report will be updated.

NAME April Lagano

DATE 08/09/2023

SUPERVISOR MM