DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated Inspection

FACILITY: Premium Machine and Tool		SRN / ID: 1/341504733
LOCATION: 207 Water Street, Lyons		DISTRICT: Grand Rapids
CITY: Lyons		COUNTY: IONIA
CONTACT: Mark Schneider, Owner		ACTIVITY DATE: 06/29/2015
STAFF: Eric Grinstern	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Unannounced Inspe	ction	********
RESOLVED COMPLAINTS: C-	15-00860	***************************************

Unannounced inspection of Premium Machine and Tool.

June 18, 2015 – Staff arrived at facility and was informed by the Office Manager, Ms. Kirby, that the owner was out of the office and would not be returning until the following Tuesday. Ms. Kirby stated that the owner was the only person that could provide information regarding the facility.

June 29, 2015 – Staff consisting of Eric Grinstern and Kaitlyn DeVries returned to the facility and met with the facility owner, Mark Schneider.

FACILITY OPERATIONS AND CORRESPONDING COMPLIANCE STATUS

Mr. Schneider provided a summary of the facility's operations.

The facility has been in operation at the location since 1997. The facility operates one shift five days a week. The facility employs 8 workers on the floor. The facility fabricates parts for the office furniture industry. The parts are fabricated via cutting, welding, stamping, grinding, etc. All of the parts that are fabricated are powder coated. Coated parts are packaged for shipping.

FABRICATION

Fabrication is conducted via various processing including cutting, stamping, cutting and grinding. All emissions from these processes are vented to the general in plant atmosphere. The processes observed during the inspection are exempt from needing an air use permit via the exemptions under Rule 285(vi)(B).

COATING

After fabrication the parts are cleaned prior to powder coating. The parts are racked and sprayed with a hand wand with a cleaning solution (MSDS provided), which is subsequently power washed off. The cleaning solution is a phosphoric acid, propylene poly glycol, sodium molybdate dihiydrate solution. The racked parts are then loaded in an oven to be dried. Mr. Schneider stated that the oven has a 70,000 Btu burner. After drying, the racked parts are placed in a powder coating booth where coating is applied with manual applicators. The booth has a duct the vents to the outside and terminates at a 55 gallon drum with a slanted cap. The racked parts are subsequently loaded in the same oven used for drying and allowed to cure.

A powder coating booth and associated oven are exempt from the need to obtain an air use permit if the booth has an appropriately designed and operated particulate control system. During the inspection staff did not observe an appropriately designed particulate control system.

In regards to the removal of coating build-up on the racks, Mr. Schneider stated that he had previously used a torch to burn the coating off the racks 1-2 times a year. This activity is what resulted in a complaint to AQD. Mr. Schneider explained that he believed he was allowed by the village to conduct the activity as part of maintenance. Staff explained that burning the coating off the racks is not a permissible activity. Mr. Schneider stated that he now removes the coating off the racks by leaving them in the oven for an extended period of time, after which the coating can be scrapped off. Operation of the booth in a manner other than to cure the powder coated parts is not exempt from the requirement to obtain an air use permit. Operation of the oven in this manner is the same as a rack burn-off oven that would require an air use permit and potentially require an air emission control device.

Based on the information and observations made during this inspection, the facility will receive a VN for operating an unpermitted powder coat booth and for operating an unpermitted rack burn-off oven.

NAME

DATE 6/30/15

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