

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

U41151158531764

FACILITY: Viking Spas		SRN / ID: U411511585
LOCATION: 2725 Prairie St. SW, Wyoming		DISTRICT: Grand Rapids
CITY: Wyoming		COUNTY: KENT
CONTACT: Kelly Crowley , Logistics Manager		ACTIVITY DATE: 10/02/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <i>minor</i>
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection. In the parking lot, I spoke briefly with Tom Veneklas, Owner who informed me which door to go in and to ask for help in the shipping area.

I did so and met with Kelly Crowley, Shipping Manager. I presented Mr. Crowley with a copy of the DEQ Environmental Inspections: Rights and Responsibilities brochure and we discussed the contents. This facility manufactures spas (hot tubs) out of high density polyethylene (HDPE). While Viking designs and makes the molds for the spas, the actual HDPE shell is made elsewhere, then shipped to this facility.

The shell comes in, and workers add the jets and wood support rails to the spa. During this time, paint is used to paint the bottom rail with a black latex paint that is applied with a roller and glue is applied at a rate of 5 pints (0.6 gallons) per day. This is exempt per Rule 287(c) which allows for 200 gallons of coating (minus water) to be used per month. The usage is below that. It is requested that Viking keep track of the paint and glue use on a monthly basis to demonstrate compliance going forward.

The spa then moves through a spray booth where a 2 part polyurethane/MDI foam is applied. The booth is equipped with a fan and filters at the top of the booth, which is then vented horizontally from the building through a wall fan. At the exit point there was a very small amount of material on the vent louvers, and it was recommended that the facility evaluate whether or not build up is occurring in the stack. It takes a turn in the building, and foam particulate could accumulate there.

The mold room where the molds are made, uses molding putty to create the shape of the spa shell. This is internally vented and does not appear to generate air contaminants. A 2 component Speedy Pack Foam Pellet maker is present and is only used for mailing/shipping small items. Emissions are minimal to none from this process based on limited information available.

Mr. Crowley, Mr. Veneklas and I adjourned to the shipping office to look over the SDS for the two part spa insulating foam. I requested that they contact the supplier who could help them to identify emissions (if any) from this process. They were able to contact William Robert of BASF Polyurethanes, who was able to provide emissions of MDI and explain the chemistry. Basically due to the very low vapor pressure and the benzene "ring" emissions of MDI and that family of pollutants are almost zero. Mr. Robert indicated that annual emissions would be 7.45E-04 lb/year based on the current maximum usage. Due to the air toxics program in Michigan I asked Mr. Robert about emissions from the chemical CAS # 460-73-1, (ITSL 2,000 ug/m3 24-hr) and he indicated that approximately half of that chemical would be emitted. Based on usage, it appears as though emissions of this toxic air contaminant would be ~ 500 pounds per month.

Viking needs to begin monthly tracking of the emissions from this process based on actual usage. A follow-up inspection will be conducted within the next year to determine final compliance. However, at this time Viking will be considered in compliance.

NAME *April Lazzaro*

DATE 10-19-15

SUPERVISOR PAB