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

N082459551				
FACILITY: PLASCORE INC	SRN / ID: N0824			
LOCATION: 615 N FAIRVIEW ST, ZEELAND		DISTRICT: Grand Rapids		
CITY: ZEELAND		COUNTY: OTTAWA		
CONTACT: Bethany Meza , EHS Engineer		ACTIVITY DATE: 08/27/2021		
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT		
SUBJECT: FY '21 on-site inspection to determine the facility's compliance status with PTI no. 72-98K and any other applicable air quality				
rules and regulations				
RESOLVED COMPLAINTS:				

On August 27, 2021, AQD staff Chris Robinson (CR) conducted an unannounced inspection of Plascore Inc. (SRN N0824) located at 615 North Fairview and 500 East Roosevelt in Zeeland, Michigan. The purpose of the inspection was to determine the facility's compliance status with Permit to Install (PTI) no. 72-98K and any other applicable air quality rules and regulations.

Plascore's environmental contact was unavailable therefore staff Greg Peters provided the onsite portion of the inspection. CR informed Mr. Peters of the purpose of the visit and provided identification. Ms. Bethany Meza is the new environmental contact who provided the necessary records.

The Weather conditions were approximately 73°F, partly cloudy with east winds at approximately 6 mph (www.weatherunderground.com). No odors or visible emissions were observed during the inspection.

A) Facility Description

Plascore, Inc. (Plascore) is a manufacturer of light weight "honeycomb" shaped material that is placed in between boards to create a rigid panel that is subsequently used in a variety of applications. The honeycomb material can be created from aluminum, stainless steel, Nomex, or plastic.

Plascore consists of five (5) buildings; 615 Fairview Street (Metals and panels); 500 East Roosevelt (Aramid); 450A East Roosevelt (Machine Core); 500C East Roosevelt (Plastics); and 581 Roosevelt (Cold Machine Core). All five buildings were inspected on August 27, 2021.

Other exempt operations are also located on site and will be described in further detail below.

B) Regulatory discussion

Plascore is a synthetic minor source of Volatile Organic Compounds (VOC's) and Hazardous Air Pollutants (HAP's). Plascore currently only holds one (1) Opt-Out permit, PTI No. 72-98K.

C) Compliance Evaluation

1) PTI 72-98K

This PTI consists of two flex Groups (FGFAIRVIEW, FGROOSEVELT) and source wide Optout conditions (FGFACILITY). Most of the Special Conditions for FGFAIRVIEW and FGROOSEVELT are identical, therefore they will be discussed simultaneously.

FGFAIRVIEW & FGROOSEVELT

FGFAIRVIEW consists of three (3) web print lines and two clean lines with ovens controlled by either Regenerative Thermal Oxidizer #4 or Regenerative Thermal Oxidizer #6. This equipment is located at 615 N. Fairview Rd. FG ROOSEVELT consists of four (4) Equipment Groups described in the EU Description and print line No. 3 which are controlled by Regenerative Thermal Oxidizer #2, Regenerative Thermal Oxidizer #3, Regenerative Thermal Oxidizer #5 and/or Regenerative Thermal Oxidizer #7. This equipment is located at 500 E. Roosevelt Ave.

The emission limits in the table below apply as noted in Section I (Emission Limits) of the PTI. Also, as noted in the "MAX Facility Calculated" column Plascore appears to be operating within those emission limits.

Flex Group	Pollutant	Limit	Time period	MAX Facility Calculated (Sept. 2020 – Aug. 2021)
FGFAIRVIEW	Isopropyl Alcohol (CAS No. 67-63-0)	125.956 lb./day	Calendar Day	4.14 lbs. in July 2021 (avg. pounds /day)
	VOC	20.0 tpy	12-month rolling	2.59 tons (Sept. 2020)
	Formaldehyde (CAS No. 50-00-0)	167.84 lb./yr.		9.49 lbs. (Sept. 2020)
FGROOSEVELT	VOC	65.0 tpy		42.43 tons (Sept. 2020)
	Formaldehyde (CAS No. 50- 00-0)	0.41 tpy		630.50 lbs. (0.32 tons, Sept. 2020)

As observed and discussed with Mr. Peters all waste material is stored in closed containers (SC III.1) and all other materials are stored in closed containers (SC III.2) which are stored in fireproof cabinets. A current malfunction abatement Plan (MAP) is on file with AQD, and the facility appears to be complying with the requirements specified within (SC III.3). At this time the MAP appears to be sufficient, and no revisions are being requested. Special Condition IV.1 requires an application system to have a transfer efficiency equal to that of a roller system or equivalent. The facility uses a roller system and there have been no changes since initially permitted and installed.

The ovens are equipped with interlocks that prevent the oven/dryer from operating at a higher pressure than adjacent areas (SC IV.2). The pressure has to be negative in order to ensure proper operation. Although pressure gauges are not present proper maintenance and operation of the interlocks ensures negative pressure. Only one oven was operating at the time of this inspection which appeared to be operating properly. Tests of the interlock system are required to be conducted annually (SC V.1); however, this is being done quarterly as part of the facility's Preventative Maintenance. Maintenance records were provided (SC VI.7), which are attached. Process equipment is not operated unless the proper RTO is operating. Each RTO has been equipped with a temperature monitoring and continuous recording device (VI.2). During the inspection RTO #2 (8K) was operating at approximately 1,561°F and RTO #6 (11K) was operating at approximately 1,646°F, which are both above the minimum temp of 1,500°F. Temperature records were provided for all of the RTO's and based on these records the units appear to be operating properly. The RTOs are calibrated (SC IV.4) as required. Records of the last calibrations were provided and are attached.

Records required to be maintained per SC VI.3-7 for FGFAIRVIEW and SC VI.3-6 of FGROOSEVELT were requested and provided in a timely manner, which are included with this report.

The requirements listed in FGFAIRVIEW SC V.3 and FGROOSEVELT SC V.3-5 discuss testing requirements for the RTO's. Testing has been completed as required and at this time the AQD is not requesting any additional testing.

Section VIII provides stack diameter and height requirements. These were not verified but were observed and all appeared to meet the requirements listed.

FGFACILITY

The entire facility is subject to the following emission limits:

Pollutant	Limit	Time period	MAX Facility Calculated
			(Sept. 2020 – Aug. 2021)
Each Individual HAPs	< 9.0 tpy	12-month rolling	Phenol 6.98 tons (Sept. 2020)
Aggregate HAPs	< 22.5 tpy		9.11 tons (Sept. 2020)
VOC	89.0 tpy		51.74 tons (Sept. 2020)
Formaldehyde (CAS No. 50-00-0	2,018.4 lb./yr.		673.47 lbs. (Sept. 2020)

Records required to be maintained per SC VI.1-4 were requested and provided in a timely manner, which are included with this report. Based on the records provided and as summarized in the table above Plascore appears to be operating within the facility wide emission limits specified in FGFACILITY of PTI 72-98K. As allowed by the July 5, 2007, Approval letter Plascore utilizes manufacturers' formulation data to determine VOC content.

2) Rule 201 Permitting Exemptions

Plascore operates additional equipment under various Rule 201 permitting exemptions. This includes one (1) powder coating line and associated cure oven which appears to be exempt per Rule 287(2)(d); several CNC stations with internally vented baghouses which appear to be exempt per Rule 285(2)(l)(vi)(B); one (1) paint booth with a maximum monthly usage over the last year of 33.76 gallons. This booth appears exempt per Rule 287(2)(c); one caustic bath and associated water rinse baths that are exhausted externally and appears to be exempt per Rule 285(2)(I)(iii); six (6) sawing stations for cutting the honeycomb blocks to correct size where emissions are exhausted to one of two pulse-jet baghouses which are then externally exhausted. This process appears to be exempt per Rule 285(2)(I)(vi)(C); two (2) plastic extrusion lines (polypropylene and polycarbonate) which appear exempt per Rule 286(2)(a). A plastic laminating station, that is exempt per Rule 286 (2)(d) for plastic thermoforming equipment and two (2) natural gas ovens that are exempt per Rule 282(2)(b)(i). Sawing stations that are controlled by dust collectors and exhausted to the in-plant environment which are exempt per Rule 285(2)(I)(vi)(B); two (2) CNC routers, which are exempt per Rule 285(2)(l)(vi)(B), one (1) natural gas cure oven, which is exempt per Rule 282(2)(b)(i), and a phosphoric acid anodizing line with an associated cooling tower. The anodizing line is exempt per Rule 285(2)(r)(vii) and the cooling towers exempt under Rule 280(2)(d).

3) MAERS

Plascore's 2020 emissions data was submitted to MAERS on time (1/12/21) and was reviewed by AQD on May 24, 2021. No issues were noted, and the submittal was accepted as is. A summary of the submittal is below.

Pollutant	Amount (tons)
PM10	0.10

SO2	0.02
VOC	48.59

D) Compliance Determination

Based on the observations and discussions made during the inspection and a subsequent records review Plascore appears to be in compliance with PTI 72-98K and other applicable air quality rules and regulations.

NAME

DATE 9/22/2021

SUPERVISOR