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

N589168940

FACILITY: SPI Blow Molding, LLC		**SRN / ID:** N5891
LOCATION: 3930 Bessemer Rd., COLOMA		**DISTRICT:** Kalamazoo
CITY: COLOMA		**COUNTY:** BERRIEN
CONTACT: John Doster II , Owner		**ACTIVITY DATE:** 08/22/2023
STAFF: Rachel Benaway	**COMPLIANCE STATUS:** Unknown	**SOURCE CLASS:** MINOR
SUBJECT: On-site inspection to verify compliance with PTI #146-06 and all state and federal air use regulations.		
RESOLVED COMPLAINTS:		

AQD staff, Rachel Benaway and Jared Edgerton, completed an unannounced air quality inspection of SPI Blow Molding, LLC (N5891), a custom injection molding (plastic blow molding) facility located in Coloma, MI, on 8/22/2023. The purpose of this inspection was to verify SPI is in compliance with their Permit to Install (PTI) #146-06 and all state and federal air use regulations. SPI is considered a minor source of hazardous air pollutants (HAPs), nitrogen oxides (NOx), sulfur oxides (SOx), carbon monoxide (CO), lead (Pb), particulate matter (PM), and volatile organic compound (VOC) emissions. The facility is not subject to any New Source Performance Standard (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP). The last inspection was completed at the facility on 12/21/2009. John Doster is the facility owner, responsible for submitting requested records. Edward Trapp, the General Manager, and Alan Golladay, the Operations Manager, were present for the on-site inspection. Personal protection equipment includes a safety glasses, shoes, and hearing protection.

The facility operates 3 shifts per day, 5 days a week, and employs approximately 37 people. SPI uses injection blow molding machines to create hollow plastic parts (barbeque grill wheels, classroom seats, floating docks, RV water tanks, lifeguard spine boards) for agricultural, industrial, and recreational (RV industry) use. Upon arriving, Staff spoke with John Doster II over the phone. Mr. Doster II informed Staff that he was under the impression the permit had been voided because the burnoven was no longer in use. The purpose of the inspection shifted to verifying the existence and condition of the permitted equipment, assessing the status of facility operations, and confirming if any process equipment had been installed, relocated, or modified since the last inspection.

#	Equipment at Facility
1	Burnoff oven
14	Injection mold machines (Exempt Rule 286(2)(b) through (e))

The previous inspection report noted the facility was conducting foam or insulation injection (reaction injection molding) into parts that require more rigidity. The facility reported that they have not been doing this since 2010 or 2011. Staff did not observe this activity or equipment used for this purpose during this inspection.

Various injection mold machines were observed in operation during the facility walkthrough. The facility uses "Stoner" brand, dry film, aerosol mold release at the machines. An internal duct system gathers spent plastic from each workstation and collects it for reuse at the plant. Material not suitable for reuse is sent for recycling through a third party.

Adjacent to the injection mold machine shop area, Staff observed a small Grieve EB-350 (Serial #460356) electric convection batch oven that is used to heat plastic parts to approximately 160-180 degrees, F, to remove metal grommets. The unit does not vent externally and appears to be exemp per Rule 286(2)(b).

Staff also observed a large, electric "Drying Systems, Inc." industrial batch oven (Serial #11051) located within a locked and gated storage area. The oven had various items piled in front of the primary chamber doors and appeared not to be in use. There was no exhaust stack attached to the unit and no external exhaust port along the interior wall where the unit was situated. Facility personnel explained that the unit was purchased from a facility in the area that shut down. Staff informed the facility that if they intend to use it, outside ventilation would be advisable, and for that they would need to obtain a PTI first.

PTI #146-06 is for a shop-built 4 ft by 4 ft side draft hood where an operator would use a propane torch to manually burn off plastics from metal tooling parts. Attached to the hood was an exhaust dry filter particulate control system with a pre-filter and final stage filter that is vented through an external stack. This unit is located in a separate maintenance building. Staff observed that the unit was being used as a storage cabinet with empty propane tanks below it and empty paint cans as well as a plastic-lined box on the inside collecting rainwater that was leaking in through the stack at the top. There did not appear to be any filters in place and Staff concluded the unit had not been used for the purpose of plastic burnoff in quite some time. The facility confirmed this and due to a lack of use, no records such as pressure drop readings from the particulate control system and monthly operational records like dates and durations of burnoff events required by the PTI could be obtained for compliance verification.

After the inspection, Staff informed Mr. Doster II that the unit would need to be dismantled and removed before the PTI could be voided. Mr. Doster II sent Staff photographic evidence that the unit was dismantled on 9/12/2023 along with a written request to void PTI #146-06. Staff will submit this request to void the PTI to the Permit Section.

No compliance determination can be made for this facility at this time.

NAME Rachel Broaway DATE 9/7/2023 SUPERVISOR Monica Brothers