

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

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| FACILITY: R L Adams Plastics, Inc. | | SRN / ID: N7221 |
| LOCATION: 5955 Cross Roads Commerce, WYOMING | | DISTRICT: Grand Rapids |
| CITY: WYOMING | | COUNTY: KENT |
| CONTACT: Duane Berends, Dir. of Safety & Training | | ACTIVITY DATE: 08/28/2015 |
| STAFF: Kaitlyn DeVries | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: The purpose of this inspection was to determine compliance with MI-ROP-N7221-2015 and all other applicable Air Quality Rules and Regulations. | | |
| RESOLVED COMPLAINTS: | | |

On Friday August 28, 2015 AQD Staff Denise Plafcan (DP) and Kaitlyn DeVries (KD) conducted a scheduled unannounced inspection of R.L. Adams Plastics (R.L Adams) located at 5955 Cross Roads Commerce, Wyoming, Michigan. The purpose of this inspection was to determine compliance with MI-ROP-N7221-2015 and all other applicable Air Quality Rules and Regulations.

AQD staff arrived at the facility at approximately 9:00 am and observed the area for odors, fugitive emissions, and opacity prior to entry. No odors, fugitive emissions, or opacity was observed. Upon entering the facility, staff met with Karl Adams, General Manager. Duane Berends, Director of Safety & Training, was not available, but provided the appropriate records to KD via e-mail the following week. The Environmental Inspections Rights and Responsibilities pamphlet was presented and briefly discussed with Mr. Adams prior to a tour of the facility. Sean Fey, Director of Engineering, also accompanied staff on the tour.

Facility Description

R.L Adams is a foam product manufacturer that primarily produces goods for the food service, building product, and arts & crafts industries. R.L Adams operates three shifts five or seven days per week with seasonal variability. There was no indication of changes to any of the stacks; however, specific stack dimensions were not verified as part of this compliance inspection.

The facility consists of four primary areas, the lamination area, the thermoform area, the extrusion area, and the warehouse. The lamination area consists of two (2) identical lines that heat up the foam for application of paper onto both sides of the product for residential and commercial industries. Scrap from this area is ground to be used again for foam production. There are three (3) thermoform lines that allow for stamping of a variety of products, including foam plates and bowls. Only one line was in production at the time of the inspection. Scrap from this area is also ground to be re-used for foam production. The extrusion area is where the foam is produced. R. L Adams has three (3) tandem extrusion lines that utilize independent blowing agents. Three (3) blowing agents are used, Freon, CO₂, and Isopentane. The MSDS for the isopentane is attached to this report. The extrusion lines use both virgin ingredients and reground materials to produce the foam. Additionally, the warehouse areas were viewed, but contains no equipment associated with air contaminants.

Compliance Evaluation

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I. Emission Limits: Emissions include PM and VOC's. PM is limited based on test protocol. VOC's are limited to 130 TPY 12-Month Rolling. Per the attached records, as of July 31, 2015 the 12-month rolling emissions is 69.293 tons.

II. Material Limits: Production and isopentane usage is limited based on the following equation:

$$(BA_P * S_P) + (BA_L * S_L) \leq 260,000 \text{ pounds of VOC per year (130 tons per year)}$$

Where:

BA_P = percent isopentane in plate stock, in lbs/100 lbs of stock produced

S_P = scrap from plate production in lbs/month

BA_L = percent isopentane in laminate stock, in lbs/100 lbs of stock produced

S_L = scrap from laminate production in lbs/month

All of the appropriate records for this are clearly labeled on the records provided (see attached). Additionally, the 260,000 pounds of VOC corresponds to the 130 ton limit for which as of July 2015, the 12 month rolling VOC emissions is 69.293 tons.

III. Process/Operational Restrictions:

- a. Based on the observations on site, the isopentane monitor appeared to be properly operating.
- b. There are four (4) baghouses associated with the regrind process. All four (4) are equipped with magnehelic's for pressure drop monitoring and were in operation at the time of the inspection. KD noted that the area surrounding baghouse #4 was rather dirty. KD informed Mr. Adams and Mr. Fey that this area should be cleaned up, and could be indicative of a problem with one of the bags.

IV. Design/Equipment Parameters: NA

V. Testing/Sampling: NA

VI. Monitoring/Recordkeeping: Please see the attached records for complete details.

- a. Based on on-site observations, the isopentane usage appeared to be appropriately monitored. The isopentane containing scrap is appropriately being tracked. R. L Adams is tracking the percent isopentane used, pounds of isopentane used, and pounds of scrap used in each operation (lamination and thermoforming).
- b. Production records for pounds extruded, laminated, and thermoformed appear to be complete and acceptable.
- c. VOC emissions are being properly recorded on a monthly and 12-month rolling basis; the largest amount of VOC's emitted in one month was 7.982 tons in April of 2015.
- d. R.L Adams currently has four (4) baghouses. Each baghouses was properly equipped with a magnehelic and the facility is maintaining associated records for each baghouse (see attached). At the time of the inspection, the pressure drops for the four (4) baghouses were as follows: 0.7 inches water, 2.8 inches water, 1 inch water, and 0.5 inches water.

VIII. Stack/Vent Restrictions: There was no indication of changes to any of the stacks; however, specific stack dimensions were not verified.

R.L Adams has one (1) parts cleaner that is maintained by Safety Kleen. This piece of equipment is exempt under Rule 281 (h).

Compliance Determination

Based on the observations made during the inspection and the information provided R. L Adams appears to be in compliance with MI-ROP-N7221-2015 and all applicable air quality rules and regulations.

NAME Kaitlyn Adams

DATE 9.16.2015 SUPERVISOR PHB