

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

N775428266

FACILITY: Harbor Foam		SRN / ID: N7754
LOCATION: 2950 Prairie SW, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Laura Kuperus, Owner		ACTIVITY DATE: 01/08/2015
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules and regulations and the initial Renewable Operating Permit (ROP) No.MI-ROP-N7754-2013. DP drove around the area prior to entering the facility. There were no odors and or fugitive emissions noted, however, it was extremely windy, cold <10°F, and snowing. DP met with Ryan VanDyke since Laura Kuperus was not immediately available but did arrive later. Ryan was the escort on the inspection. With both Ryan and Laura DP explained the purpose of the inspection and reviewed the Environmental Inspection brochure.

Harbor Foam manufactures blocks made of expanded polystyrene beads. Their process includes a Hirsch 9000 resin pre-expander, 8 canvas holding bags, Hirsch adjustable wall mold, hot room, wire cutting operations, scrap densifier, and an embossing area. They use steam and pressure to force the bonding/heating in the middle of the block. With less moisture they do not have to use the heating room as often. They have 30 employees working 3 shifts 6 days a week. Previously they were working 12 hours 3-4 days per week, so production has increased over the past couple of years.

ROP No. MI-ROP-N7754-2013 EMISSION UNIT CONDITIONS for EUPLASTICRESIN which includes the following equipment: Hirsch 9000 resin pre-expander, canvas holding bags, Hirsch adjustable wall mold, hot room, wire cutting operations, embossing area, and other polystyrene foam producing operations.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Compliance
VOC	139.8 tpy	12-month rolling time period as determined at the end of each calendar month	Through November 2014 they emitted 183,032 pounds of VOC or 91.5 tons (65% of the limit).

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Compliance
VOC	6.3 lbs/100lbs of EPS beads as received	12-month rolling time period as determined at the end of each calendar month	4.5 lbs/100lbs of EPS beads as received through November 2014

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years.

1. Within 60 days of permit issuance, the permittee shall verify the VOC content, as shipped, of product from EUPLASTICRESIN, by testing at owner's expense, in accordance with Department requirements. The samples shall represent the full range of VOC content of EPS beads used in EUPLASTICRESIN and shall support an estimate of the production-weighted average VOC content of product from EUPLASTICRESIN. The permittee shall use sampling and analysis methods approved by the AQD District Supervisor. Sampling was conducted within 60 days on October 8, 2013 and the results are attached along with sampling that was conducted on September 25, 2102.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years.

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. Records are being maintained and were sent electronically the same day, see attached.
2. The permittee shall keep, in a satisfactory manner, a separate record of the pounds of VOC per 100 pounds of EPS beads for each shipment of EPS beads received and at the end of every month shall calculate the rolling 12-month average VOC content of all beads used in the previous 12 months. Records are being maintained and were sent electronically the same day, see attached.
3. The permittee shall keep, in a satisfactory manner, a separate record of the pounds of scrap material processed by the grinder. Scrap processed through November 2014 was 124,775 pounds or 62.4 tons. The VOC content per 100 pounds is 3.1. Voc retained in the scrap is 2.2 pounds per 100 pounds. The scrap VOC emissions are 1,123 pounds or 0.6 tons.
4. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the throughput of EPS beads at the pre-expander portion of EUPLASTICRESIN. Records are being maintained and were sent electronically the same day, see attached.
5. The permittee shall keep, in a satisfactory manner, records of the VOC content, as shipped, of product from EUPLASTICRESIN. All records of VOC content determinations shall be kept on file and made available to the Department upon

request. Records are being maintained and were sent electronically the same day, see attached.

6. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the VOC emission rate from EUPLASTICRESIN using the method detailed in Appendix 7. Records are being maintained and were sent electronically the same day, it appears that correct calculations are being used, see attached.

VII. REPORTING

MAERS and ROP Compliance Status reports are being submitted as required.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)
SV-1	24	43
SV-2	16	41

Stack dimensions were not verified due to the winter weather conditions.

D. FLEXIBLE GROUP CONDITIONS There are no special conditions that apply to more than one emission unit, this section is blank.

Based on the physical inspection and a review of records submitted it appears that the facility is in compliance with state and federal Air Quality rules and regulations and MI-ROP-N7754-2013.

NAME Denise Pagan DATE 1-14-15 SUPERVISOR PAAS

