

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

U4114497325530

FACILITY: Caribbean Pool & Fiberglass Products, Inc.		SRN / ID: U41144973
LOCATION: 300 Lincoln Lake Ave., SE		DISTRICT: Grand Rapids
CITY: Lowell		COUNTY: KENT
CONTACT: Dan Greenway, Owner		ACTIVITY DATE: 03/14/2014
STAFF: Denise Plafcan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Fiberglass tank manufacturer facility first inspection, VN issued for Rule 201		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules and regulations. DP drove around the area prior to entering the property and the facility. There were no odors, fugitive emissions or opacity noted from the facility. However, the styrene odor inside the front door was very strong. DP met with Dan Greenway, owner, after a brief introduction and explaining the unannounced requirement of the inspection, Dan insisted no one else was available and he didn't have time for the inspection but was not denying entry. DP provided a copy of the Environmental Inspection brochure and agreed to wait until Dan had finished the tour with his customer. Dan returned and agreed to the inspection but emphasized his time was limited.

Caribbean Pool and Spa has not made any pools or spas for 10 years some of the molds have been converted into storage rooms with doors. They do make fiberglass stacks, tubes or cylinders and miscellaneous structures for large fan housings and piping. There are 7 employees working one shift 5 days a week. The fiberglass operations are mainly hand lay-up but some pieces are done with a chopper gun. All operations are in one large open space with no stacks but they do have 2 large (~3foot) ventilation fans at the east end of the building to draw the odors from the room. Dan said they seldom use the fans. The odors in the room were very strong there was also a lot of dust on the floor from sanding and grinding the fiberglass pieces. There wasn't any control or collection for any of the operation.

Dan explained his previous work in the environmental area and that since he didn't have stacks he believed he was not required to have an air quality permit. DP explained the requirements of Rule 201 and that the only exemption that may work would be a Rule 290 exemption. However, it did not seem likely that Rule 290 would be appropriate for a fiberglass operation. Since Dan was leaving on vacation DP agreed to have September through December 2012 purchase records and MSDSs submitted by Friday March 21. Records for September through December were received on March 24, 2014 (see attached records and e-mail).

Calculations were reviewed using a worst case scenario of all that is purchased is applied and the Unified Emission Factor of Open Molding of Composites for manual layup is 174 pounds of Styrene per ton for materials containing 49% styrene, therefore all emissions are at the highest level. Based on the records provide, they ae emitting approximately 2.1 tons per year. Since Styrene is a carcinogen, 2 tons a year exceeds the limits of a Rule 290 exemption. Therefore, the fiberglass operation does require a Permit to Install to comply with Rule 201 requirements. A violation notice will be issued for failing to acquire a PTI when the equipment was installed. DP will notify Dan that he will be receiving a Rule 201 violation notice.

Based on the physical inspection and the records provided and materials used the facility appears to be in noncompliance with state and federal Air Quality rules and regulations.

NAME Denise Plafcan

DATE 6/17/14

SUPERVISOR PAB