

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

B564452680

| | | |
|--|-------------------------------|---------------------------|
| FACILITY: Americhem of Michigan, Inc. | | SRN / ID: B5644 |
| LOCATION: 55 Cottage Grove Street SW, GRAND RAPIDS | | DISTRICT: Grand Rapids |
| CITY: GRAND RAPIDS | | COUNTY: KENT |
| CONTACT: Mike Roberts , Plant Manager | | ACTIVITY DATE: 03/05/2020 |
| STAFF: April Lazzaro | COMPLIANCE STATUS: Compliance | SOURCE CLASS: Minor |
| SUBJECT: Unannounced, scheduled inspection. | | |
| RESOLVED COMPLAINTS: | | |

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Mike Roberts, Plant Manager and Aaron Skomial, Asset Reliability Manager. Both provided information during the inspection which included a pre-meeting, a facility-wide inspection and post-meeting discussion.

FACILITY DESCRIPTION

Americhem of Michigan, Inc. is a plastic compounding facility that makes polyvinyl chloride (PVC) and thermoplastic elastomer (TPE) products which are the basis for both rigid and flexible plastic products. The ingredients are mixed and then extruded into small pellets for use at plastic parts manufacturing operations. The plastics may be used in a variety of industries, including automotive. Mr. Roberts stated that there are no perfluorinated compounds used in the manufacture of the plastics.

Permit to Install (PTI) No. 152-18 was issued for the dry blending vessels that are exhausted to a cartridge dust collector. The permit states that the dust collector may vent indoors or outdoors.

The facility also operates two vapor intrusion systems that are exempt pursuant to Rule 290.

There are no boilers and no liquid solvents present at the facility at this time. There are four raw material silos that contain noncarcinogenic solid material and one finished goods silo housed outside the building that are equipped with fabric filter collector systems (bin vent filters) and are exempt pursuant to Rule 284(2)(k). There are raw material tanks housed inside that contain non-VOC, non-carcinogenic liquids that are internally vented. The tanks do not appear to emit a regulated air contaminant, however as they are all less than 40,000 gallons could also be exempt pursuant to Rule 284 (2)(i).

COMPLIANCE EVALUATION

PTI No. 152-18

Each of the dry blending vessels at the facility have a hood and associated ventilation ductwork that captures the particulate generated when adding materials to the vessel. The ductwork is vented to the permitted Donaldson cartridge dust collector. The permit has a particulate matter (PM) emission limit of 0.05 lb/hr, and the monitoring method is to monitor and record the pressure drop of the unit once per month. The permittee is also required to implement and maintain a malfunction abatement plan (MAP) for the cartridge dust collector. The MAP was submitted timely on November 14, 2018 and is being followed. The permittee is recording the pressure drop once a month in the maintenance records, and the pressure drop at the time of the inspection was 3.2" H₂O. This is within the manufacturer's recommendation that it be less than 6" H₂O.

Rule 290

The soil vapor extraction (SVE) system, which is exempt from permitting pursuant to Rule 290 consists of two separate fans and exhaust pipes vented through the roof and was installed approximately two years ago. The combined emissions of trichloroethylene (TCE) at the initial draw of air was 16 pounds per month, which is below the limit of 20 pounds per month established in the Rule 290 exemption. They currently conduct quarterly sampling and the most recent results from November 2019 showed emissions are at 0.83 pounds per month for the two exhaust pipes combined. The sampling frequency could be reduced to once per year. If future sampling shows elevated emissions, the company could choose to increase the frequency. I also discussed this with Jay Poll of the Remediation & Redevelopment Division who agreed with my rationale and indicated that his division does not dictate

the frequency of sampling.

CONCLUSION

Americhem of Michigan, Inc. was in compliance at the time of the inspection.

NAME April Longman

DATE 3-11-20

SUPERVISOR [Signature]