

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

N775446700

FACILITY: Harbor Foam		SRN / ID: N7754
LOCATION: 2950 Prairie SW, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Laura Kuperus , Owner		ACTIVITY DATE: 10/19/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Harbor Foam, Inc. (HF) facility located in Grandville, MI at 9:45am on October 19, 2018 to complete a scheduled unannounced inspection. The weather conditions at the time of the inspection were mostly cloudy, high 40's °F and winds from the south/southwest at 10-15mph. Prior to entering the facility offsite odors and visible emissions readings were completed. No identifiable odors were noted, and emissions observed were concluded to be steam.

Facility Description

HF is an expanded polystyrene (EPS) foam manufacturing facility. The facility is a major source of volatile organic compounds (VOCs) and is subject to the Title V program. The facility is in operation with one Renewable Operating Permit (ROP) No. MI-ROP-N7754-2018.

Offsite Compliance Review

- HF is required to submit semi-annual and annual compliance reports per Part A General Conditions 19-23 of MI-ROP-N7754-2018. Semi-annual and annual compliance reports were reviewed since the previous inspection in January 2017. No deviations have been reported since then; however, the semi-annual deviation report submitted for the time period of January 2018 through June 2018 was received late.
- Based on the timing of the inspection, the 2018 Michigan Air Emissions Reporting System (MAERS) Report has not been submitted by HF at this time. The 2017 MAERS Report was therefore reviewed. For 2017, approximately 113.98 tons of VOCs were emitted. Records reviewed were similar to what was observed in the records provided from the inspection and the 2017 MAERS Report was concluded to be acceptable.

Compliance Evaluation

Upon entering the site, AQD staff AS met with Mr. Mike Hickox, representative of HF, who provided a tour of the facility and answered site specific questions. A closing discussion was held at the end of the inspection with Ms. Laura Kuperus, Owner, and requested records were provided following the inspection by Mr. Andy Boddy, Consultant for HF.

MI-ROP-N7754-2018

EUPLASTICRESIN

This emission unit is for the 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.

During the course of the inspection the various stages of this emission unit were observed. EPS beads are received on site via large bulk bags. At the start of the process the beads go through a pre-expander where they are expanded. Once expanded the beads are placed into holding bags and aged appropriately. When this is completed the beads are then sent to the molding machine where they are pressed and turned into blocks with varying densities based on the function of the product. Following this the blocks are shaped to the desired size through various processes such as wire cutting before being shipped off site to the consumer. Scrap material is transported to grinding systems observed during the inspection where the material is grinded and compressed before being shipped offsite.

This emission unit is subject to a VOC emission limit of 139.8 tons per year (tpy) per a 12-month rolling time period. Records were requested and reviewed back to October 2017. For the month of September 2018, 8.31

tons of VOCs were emitted. As of September 2018, the 12-month rolling total was approximately 104.2 tpy of VOCs, which is well within the permitted limit. Previous 12-month rolling totals were also well within permitted limits. HF is subject to a material limit of 6.3 lbs/100 lbs of EPS beads as received per a 12-month rolling time period. For September 2018 the lbs of VOCs per 100 lbs of EPS beads was 4.33, which is well within the permitted limit. Previous records reviewed also show that HF is within this permitted limit.

Per Special Condition (SC).V.1, yearly testing to determine the VOC content, as received and as shipped, of EUPLASTICRESIN products shall be completed. This condition had been changed from within 60 days of permit issuance to yearly testing during the recent ROP renewal process with the permit being approved August 1, 2018. Yearly testing for 2018 had not been completed to date.

Per SC.VI.2-7, HF shall keep records of pounds of VOCs per 100 lbs of EPS beads for each shipment, 12-month rolling total VOC contents of lbs of VOCs per 100 lbs of EPS beads used, pounds of scrap material processed, EPS bead throughput at the pre-expander portion, records of VOC content of product shipped and 12-month rolling total VOC emissions. Records were reviewed, and it was concluded that HF appears to be keeping track of VOC contents, scrap material processed, EPS bead throughputs, and VOC emissions.

Two stacks are listed in association with EUPLASTICRESIN and were observed during the inspection. Though the dimensions were not measured, they appeared to be consistent with the requirements of MI-ROP-N7754-2018. At the time of the inspection rain caps were observed on both stacks. Per MI-ROP-N7754-2018 SC.VIII.1-2, the exhaust gases from the two stacks shall be discharged unobstructed vertically. In a phone conversation on November 9, 2018, this was discussed at length with the company. After further review, no violation will be issued; however, the rain caps shall be removed by December 9, 2018.

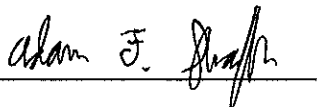
Additional Observations

- One 6.69 MMBtu/hr natural gas-fired boiler used to provide steam for the pre-expander was observed. During the ROP renewal process, HF believed that the boiler was exempt per Rule 282(2)(b)(i), which appears to be applicable. Based on the size of the boiler, it is not subject to New Source Performance Standards and since HF is not a major source of hazardous air pollutants (HAPs), it is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Part 63 Subpart DDDDD. Additionally, since the boiler is natural gas-fired, it is not subject to the NESHAP 40 CFR Part 63, Subpart JJJJJJ.
- One parts washer that utilizes mineral spirits was observed during the site inspection. The parts washer appears to be exempt per Rule 281(2)(h) and an operating procedures label was provided to HF staff to place on the parts washer.

Conclusion

Based on the facility walkthrough, observations made, and records received, HF appears to be in compliance with the MI-ROP-N7754-2018 and applicable air quality rules.

NAME



DATE

01/04/19

SUPERVISOR

