

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

P132872890

<b>FACILITY:</b> UNIBAND USA LLC		<b>SRN / ID:</b> P1328
<b>LOCATION:</b> 2500 TURNER AVE NW, WALKER		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> WALKER		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Jason Moy , Vice President of Sales and Operations		<b>ACTIVITY DATE:</b> 06/11/2024
<b>STAFF:</b> Laura Martin	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled, unannounced inspection		
<b>RESOLVED COMPLAINTS:</b>		

At approximately 1:45 P.M. on June 11, 2024, Air Quality Division (AQD) staff, Laura Martin (LM) conducted a scheduled, unannounced inspection of Uniband USA, LLC (Uniband) located at 2500 Turner Avenue NW in Walker. The purpose of this inspection was to determine compliance with Permit to Install (PTI) Number 31-23 and all other applicable Air Quality Rules and Regulations. Jason Moy (JM), Director of Operations, accompanied LM during the inspection.

This facility was previously located at 2555 Oak Industrial Drive in Grand Rapids and relocated to this new location in 2023 when the PTI application was received and approved by the AQD. While this facility was at the previous location it was assigned State Registration Number (SRN) B3718. During an inspection in 2018, a Rule 201 violation notice (VN) was issued for failure to maintain monthly records to support exemption Rule 290 compliance demonstration and the lack of evaluation of particulate emissions (in the form of oil mist/smoke) relative to Rule 290 thresholds. An air use permit application was required, in addition to an electrostatic filter system control being installed in 2019, to address the VN. Refer to inspection reports for SRN B3718 for more information pertaining to the previous violation.

#### Facility Overview

Uniband manufactures polyvinylchloride (PVC) conveyor belting in which woven polyester fabric is coated with a PVC compound (or plastisol). The facility primarily consists of two (2) web-coating lines with ovens and PVC compound mixing. Coating line one (1), EUWEBCOATINGLN01, consists of three knife-edge spreader stations, used to apply varying thicknesses of plastisol to polyester fabric, and an infrared (IR) curing oven after each edge spreader. Coating line two (2), EUWEBCOATINGLN02, consists of one knife-edge spreader station and one corresponding IR curing oven. The third line has not been installed and there are no plans to do so at this time. It should be noted that General Condition 2 (GC 2) of the PTI states that the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved must be commenced within 18 months of issuance or the PTI will become void. If the permittee has decided not to install, construct, reconstruct, relocate, or modify the equipment approved by the PTI, the permittee shall notify the Department in writing. August 2024 will be the end of this 18-month time frame. In the permit, the three coating lines are grouped together in flexible group FGWEBCOATINGLNS.

#### Regulatory Overview

##### *Emission/Material Limits*

Emissions of volatile organic compounds (VOCs) are limited to 14.8 tons per year (tpy) on a 12-month rolling time period and the maximum VOC content of any individual coating is limited to 0.9 pounds per gallon (lb./gal) (minus water, as applied). Emissions of particulate matter have three separate limits for each line including PM limited to 0.05 lbs./1000 lbs. of exhaust gas on an hourly basis, PM10 is limited to 1.322 lbs./ton of coating applied on an hourly basis, and PM2.5 is also limited to 1.322 lbs./ton of coating applied on an hourly basis.

##### *Process/Operational Restrictions*

Uniband is limited to applying (processing) no more than 29,700,000 lbs. of as-applied coating on a 12-month rolling time period. All VOC/Hazardous Air Pollutants (HAP) containing materials, including coatings, reducers, waste coatings, thinner, purge and cleanup solvents must be stored in closed

containers. Filters must be handled in a manner that minimizes the introduction of air contaminants to the outer air. FGWEBCOATINGLNS shall not operate without the submission and implementation of a malfunction abatement plan (MAP).

#### *Design/ Equipment Parameter*

Uniband shall not operate any coating line in FGWEBCOATINGLNS unless its respective electrostatic precipitator (ESP) and exhaust filters are installed, maintained, and operated in a satisfactory manner. The satisfactory operation of the respective ESPs includes, but is not limited to, operating according to the MAP specified in Special Conditions III.5 (SC III.5).

#### *Testing*

Stack testing to verify VOC, PM, PM10 and PM 2.5 emissions factors is required within 180 days from the beginning of trial operation with results submitted to the AQD within 60 days following the last date of testing.

Uniband received approval from the AQD on May 10, 2023, to utilize manufacturer's formulation data in lieu of Method 24 for determining VOC content of any coating.

#### *Monitoring/Recordkeeping*

Uniband is required to maintain a current listing of all material safety data sheets (MSDS) or manufacturer's formulation data and keep records of usage on a monthly basis including gallons or pounds of each material used and reclaimed (with and without water), VOC content of each material, and VOC emissions calculations on a monthly and 12-month rolling time period. Additionally, a log of the annual as-applied coating usage in FGWEBCOATINGLNS must be kept on a 12-month rolling time period.

#### *Stacks*

All stacks must meet the permitted dimensions of a maximum diameter of 30 inches and minimum height of 76 feet above ground, as well as venting unobstructed, vertically upwards to the ambient air.

#### *Compliance Evaluation*

##### **FGWEBCOATINGLNS**

EUWEBCOATINGLNS01 was operating during the inspection, EUWEBCOATINGLNS02 was not operating, but had been operational earlier that day and EUWEBCOATINGLNS03 had not been installed at the time of the inspection and according to JM there were no plans at the time for installation of another line, but Uniband chose to have the third line permitted for a potential increase in product demand. See discussion above regarding the 18-month window for installation. During the facility walk-through it was noted that none of the containers of material were covered. LM discussed this with JM and brought his attention to the special conditions in PTI No. 31-23 that requires all containers to be covered. While on-site, JM briefly gave an overview of the spreadsheets being maintained for the facility's recordkeeping requirements which appeared to meet the specifications of the PTI. LM requested specific records covering the time period of June 2023 through May 2024, and promptly received the records from JM.

VOC emission statements and spreadsheets containing data for each of the compounds used on a daily basis as well as instantaneous emissions were provided for the requested time period. Total VOCs for the requested time period were 3.89 tpy based on a 12-month rolling time period. The highest VOC content of an individual coating was 0.77 lbs./gal. The total usage of as-applied coating was 3,022,500.65 lbs. per year based on a 12-month rolling time period.

Stack testing occurred in November 2023, and the results were received in December 2023, showing that PM and VOC hourly limits are being met. The total filterable PM emissions were 0.098 lbs/hr.

Total PM, PM-10 and PM-2.5 emissions were determined to be 0.143 lbs/hr. Total gaseous organic emissions were 0.24 lbs/hr.

The electrostatic precipitators (ESPs) were operating during the time of the inspection, no odors or visible emissions were noted. The filters used in the ESPs are metal filters that are sent out for cleaning. Clean filters are kept on-site for replacement when the dirty filters are shipped out for cleaning and maintained as such on a rotational basis. The first draft of the MAP was submitted in October 2023, and suggested edits were sent back to the facility. A final approvable draft was accepted and added to the file in November 2023.

Material safety data sheets (MSDS) were previously printed and stored in binders on the manufacturing floor but are now stored virtually on a computer that is located near the coating lines and easily accessible. A letter requesting the use of Manufacturer's formulation data was received on May 8, 2023, and an approval letter was sent to the facility on May 10, 2023. All materials are recorded, and usage is tracked on the spreadsheets received upon request via email.

While not explicitly measured during the inspection, the stacks appeared to be in compliance with the requirements of the PTI. No odors outside the facility or visible emissions were noted during the inspection.

During the inspection LM observed that none of the material containers were properly stored or covered as is required by the permit. LM discussed this observation with JM during the inspection. On June 13, 2024, JM forwarded a lid/cover policy to LM describing procedures implemented to ensure closed containers. The facility policy contained signatures of employees as well as management and the company president. As a permitted condition, the failure to store materials in closed containers in order to reduce fugitive emissions could result in a Violation Notice (VN). JM and Uniband's prompt correction and response resolves this violation.

#### *Mixing Room*

There are two vessels used to prepare the PVC material. Essentially PVC powder is mixed with the phthalate oil and additives to create the plastisol. The two vessels are used to mix noncarcinogenic, low vapor pressure materials and are permitted as a part of the coating lines.

#### *40 CFR Subpart VVV – Standards of Performance for Polymeric Coating of Supporting Substrates Facilities*

Following the on-site inspection, it was discovered that Uniband is subject to the requirements of NSPS Subpart VVV. A polymeric coating of supporting substrate is defined as a web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil. The applicability of this federal regulation is based on the amount of VOCs used during a 12-month rolling time period. If the amount of VOCs is less than 95 megagrams (Mg) (209,439.15 lbs.), the facility is subject to only three requirements. The three requirements include making semiannual estimates of the projected annual amount of VOCs used and maintaining records of actual VOCs used, providing notification of anticipated start-up, and reporting anytime the actual use of VOCs exceeds the projected use. If the facility is using greater than 95 Mg of VOCs in a 12-month rolling time period, the facility is subject to all requirements of Subpart VVV.

Based on the records provided, Uniband is using 8,575.49 lbs. of VOCs per year, based on a 12-month rolling time period and are therefore only subject to the provisions summarized above. While these requirements will be upheld moving forward, it should be noted that this federal requirement was overlooked during the permitting process by Uniband as well as the AQD and as such no VN will be cited at this time. It should be noted that these requirements are expected to be met moving forward and failure to do so will require a VN in the future.

#### *Summary*

Since Uniband has implemented a policy to maintain proper storage and covering of all containers of material, they appear to be in compliance with all requirements of PTI No. 31-23 but should ensure that this policy is upheld. Uniband shall also comply with the requirements of NSPS Subpart VVV going forward.

NAME Laura Martin

DATE 7/31/24

SUPERVISOR HH