

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

A239628433

FACILITY: Leon Plastics		SRN / ID: A2396
LOCATION: 4901 Clay Ave. SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Roger White , Env. Mgr.		ACTIVITY DATE: 02/11/2015
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an unannounced unscheduled inspection to determine compliance with state and federal Air Quality rules and regulations and Permit to Install No. 59-00C. DP drove around the area prior to entering the facility. There were no odors or fugitive emissions noted, however, there is a fence around the property line. DP met with, Roger White, Safety and Environmental Manager, and after a brief introduction and discussion, DP explained the purpose of the inspection and reviewed the Environmental Inspection brochure.

The company has about 225 employees working three shifts five days a week manufacturing molded plastic parts with or without foam padding that may be painted or covered with fabric, vinyl, or leather. They also have two foam molding stations for two part isocyanate foam. Last November they unexpectedly lost a large customer and have shutdown many of their operations. The lines that have been shut down are listed below. Compliance with some emission unit conditions could not be determined since they were not operational and have been shut down. The only remaining emission units still operating at the plant are EUADHESIVE1 and EUCLEANUP. They also moved in some new equipment but it has never operated and is currently being warehoused at the plant.

EMISSION UNIT SUMMARY TABLE

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)
EUCONVEYOR SHUT DOWN	Plastic parts coating line. An enclosed, conveyORIZED coating line with two spray booths (1 and 2) followed by a natural gas fired cure oven. Spray booths use robotic or hand-held HVLP spray guns. The cure oven is air-dry (less than 194°F).
EUBATCH SHUT DOWN	Plastic parts coating line. Three walk-in, dry filter off-line spray booths (A, B and C) that use hand-held HVLP spray guns; two air-dried ovens (less than 194°F, batch air dry ovens 1 and 2).
EUCLEANUP	Source-wide prep and cleanup solvents: cleaning of coating equipment and paint pots, and hand-cleaning of parts in preparation for coating.
EUADHESIVE1	ConveyORIZED line consisting of two (2) adhesive spray booths, one (1) natural gas fired infrared curing oven (less than 194°F) and a single vacuum forming press.
EUADHESIVE2 SHUT DOWN	One (1) single batch adhesive spray booth, one (1) electric curing oven (less than 194°F) and a single vacuum forming press.
EUADHESIVE3 SHUT DOWN	One (1) single batch adhesive spray booth, one (1) electric curing oven (less than 194°F) and two (2) bladder forming presses.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGFINISH	Plastic parts coating and clean-up operations.	EUCONVEYOR, EUBATCH, EUCLEANUP
FGADHESIVE	Adhesive spraying operations.	EUADHESIVE1, EUADHESIVE2, EUADHESIVE3
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply Source-Wide to FGFINISH

DESCRIPTION: Plastic parts coating and clean-up operations.

Emission Units: EUCONVEYOR, EUBATCH, EUCLEANUP

EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	COMPLIANCE
VOCs	29.4 tpy	12-month rolling time period	EUCONVEYOR, EUBATCH	Highest month facility-wide between June 2014 and December 2014 was October 2014 at 4.2 tons. After the painting line went down in November the facility-wide total for December was 0.1 tons.
VOCs	8.0 tpy	12-month rolling time period	EUCLEANUP	Highest month facility-wide between June 2014 and December 2014 was October 2014 at 4.2 tons. After the painting line went down in November the facility-wide total for December was 0.1 tons.

PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall recover and reclaim, recycle, or dispose of, in accordance with all applicable air quality regulations, all purge solvents used for FGFINISH. Compliant
2. The permittee shall capture all waste coatings and solvent and shall store them in closed containers. The permittee shall dispose of all waste coatings, solvents, etc., in compliance with all applicable state air quality rules and federal air quality regulations. Compliant
3. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. Compliant
4. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. Compliant
5. The permittee shall not exceed 6000 hours of operation per year for EUCONVEYOR and EUBATCH, on a 12-month rolling time period. 5724 hours per year.

DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUCONVEYOR or EUBATCH unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. These lines were shut down during the inspection so operation was not evaluated.

TESTING/SAMPLING

1. The permittee shall determine the VOC content, water content and density of any coatings and solvents, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. Testing was not required as part of this compliance inspection.
2. The permittee shall equip and maintain EUCONVEYOR and EUBATCH with HVLP applicators or comparable technology with equivalent or better transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. These lines were shut down during the inspection so application was not evaluated.

MONITORING/RECORDKEEPING

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. All records are being maintained as required and were readily available. Attached copies were provided at the time of the inspection.

STACK/VENT RESTRICTIONS

Stack/vent dimensions and restrictions were not evaluated due to winter weather conditions and since the majority of the plant operations were shut down.

The following conditions apply Source-Wide toFGADHESIVE
DESCRIPTION: Adhesive spraying operations.

Emission Units: EUADHESIVE1, EUHADHESIVE2, EUADHESIVE3
POLLUTION CONTROL EQUIPMENT: Dry Filters To Control Particulates
EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	COMPLIANCE
1. VOCs	29.4 tpy	12-month rolling time period.	FGADHESIVE	Highest month facility-wide between June 2014 and December 2014 was October 2014 at 4.2 tons. After the painting line went down in November the facility-wide total for December was 0.1 tons.

PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste adhesive coatings and solvents and shall store them in closed containers. The permittee shall dispose of all waste adhesive coatings and solvents in an acceptable manner in compliance with all applicable state rules and federal regulations. Compliant
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. Compliant
3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. Compliant
4. The permittee shall not operate the curing ovens associated with FGADHESIVE at a temperature in excess of 194°F. They operate between 140°F and 160°F (see attached)

DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FGADHESIVE unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. Compliant
2. The permittee shall equip and maintain FGADHESIVE with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (see attached).
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner devices to monitor and record the temperature of all curing ovens associated with FGADHESIVE on a daily basis. Calibrated August 12, 2014.

TESTING/SAMPLING

1. The permittee shall determine the VOC content, water content and density of any coatings, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. Testing was not required as part of this compliance inspection.

MONITORING/RECORDKEEPING

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. All records are being maintained as required and were readily available. Attached copies were provided at the time of the inspection.

2. The permittee shall monitor and record the temperature of all curing ovens associated with FGADHESIVE on a daily basis. (see attached records).

STACK/VENT RESTRICTIONS

Stack/vent dimensions and restrictions were not evaluated due to winter weather conditions and since the majority of the plant operations were shut down.

The following conditions apply Source-Wide to FGFACILITY

POLLUTION CONTROL EQUIPMENT:**EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	COMPLIANCE
Each Individual HAP	Less than 10.0 tpy	12-month rolling time period	20.25 pounds for 2014
Aggregate HAPs	Less than 25.0 tpy	12-month rolling time period	20.25 pounds for 2014
VOCs	Less than 100.0 tpy	12-month rolling time period	Highest month between June 2014 and December 2014 was October 2014 at 4.2 tons. After the painting line went down in November the December total was 0.1 tons.
VOCs	Less than 30.0 tpy. All plastic parts coating lines operating per R 336.1632(15) in FGFACILITY	12-month rolling time period	Highest month facility-wide between June 2014 and December 2014 was October 2014 at 4.2 tons. After the painting line went down in November the December total was 0.1 tons.

TESTING/SAMPLING

1. The permittee shall determine the HAP content of any coating and solvent as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. Testing was not required as part of this compliance inspection.

2. The permittee shall determine the VOC content, water content, and density of any coating and solvent as applied and as received, using federal Reference Test Method 24. Alternatively, the VOC content may be determined from manufacturer's

formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of each material shall be verified by testing at the owner's expense. Testing was not required as part of this compliance inspection.

MONITORING/RECORDKEEPING

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. All records are being maintained as required and were readily available. Attached copies were provided at the time of the inspection.

Based on the physical inspection and the records provided the facility appears to be in compliance with state and federal Air Quality rules and regulations and PTI No.59-00C.

NAME Devon Pagan DATE 3-5-15 SUPERVISOR PAB