

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

A241624285

FACILITY: UFP Technologies		SRN / ID: A2416
LOCATION: 3831 PATTERSON SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Victor Plath, Engineering Manager		ACTIVITY DATE: 02/12/2014
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 8:30 A.M. on February 12, 2014, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of UFP Technologies (formerly United Foam) located at 3831 Patterson Avenue in Kentwood. The purpose of the investigation was to determine the facility's compliance with air use permit to install (PTI) No. 413-96A as well as state and federal air pollution regulations. Accompanying AQD staff on the inspection was Victor Plath, Engineering Manager and Scott Kloock, Tooling, Facility and Maintenance Manager. A DEQ Inspection brochure was presented to Mr. Plath.

FACILITY DESCRIPTION

UFP is a foam forming facility. Different types and sizes of foam are cut, pressed, and bonded to create packaging and other foam products for a wide variety of uses. The facility consists of foam presses, horizontal saws, vertical saws, pattern saws, water cutting lines, wire cutters and heat sealers. There are also heat laminators, several spray adhesive booths, and three pad ink printers. This equipment is covered under PTI No. 413-96A which limits the company's potential to emit of hazardous air pollutants (HAPS) below major source thresholds.

COMPLIANCE DISCUSSION

Ink pad printer:

There are three ink pad printers used to apply a small amount of ink on foam products. These units are used as part of product testing and are marked with ink when the part is acceptable. These booths are used on a limited basis.

These units are exempt from permitting under Rule 287(c). Based on company records, 1.33 gallons of ink were used in 2013 which is significantly below the 200 gallon per month limit in the Rule.

Spray booths:

There are three active spray adhesive booths at the facility all exempt from permitting under Rule 287(c). One uses a horizontal application surface and the others have vertical application surfaces. Only one of the booths was operating at the time of the inspection. All booths had filters installed or readily available for installation. According to company records only two types of adhesives are used which are the ADH376 (#1041) adhesive which contains methylene chloride, and CAD367 which has a VOC content 6.03 lbs/gallon.

Based on company records the company has not used more than 38 gallons of adhesive for all booths for all of 2013. This is significantly below the 200 gallon per month limit in Rule 287(c).

It is noted that an old spray booth (#515) is currently being used for a hot wire cutting operation. See discussion below.

PTI No. 413-96A only permits the emission of hazardous air pollutants (HAPs) including methylene chloride (which is not considered a VOC). Company records indicate that total HAP emissions of methylene chloride for 2013 were 0.230 tons which is well below the 9.0 ton per year limit.

Heat Presses:

There are various heat presses located throughout the facility. These are used to shape or bond foam to other material or itself. These are exempt under Rule 286.

Hot Wire Cutting:

The company has several stations where a hot wire is used to cut foam. These units are considered exempt from air use permitting under Rule 290. The company is essentially using an AP-42 emission factor for plastics machining (drilling/sanding/sawing) under SCC 30800701 of 13 pounds of VOC/cubic foot of material manufactured to demonstrate compliance with Rule 290. Based on company records the company had 0.00845 tons of VOC emissions in 2013. This is well below the 1,000 pound per month limit in the rule.

SIMCO Automotive:

In early 2009, UFP acquired SIMCO Automotive and moved new equipment into the plant. Essentially the equipment consists of various forming presses used to make interior automotive headliner materials. These thermoforming presses are exempt from permitting under Rule 286(d).

In addition, an associated wet jet cutting operation which uses high pressure water to cut out the mold is considered exempt from permitting under Rule 285(l)(vi). Residual particulate and moisture are collected by a cyclone while the remaining exhaust is vented to a baghouse located within the building.

SUMMARY

UFP is in compliance with all applicable requirements. Attached to this report are records obtained as part of the inspection.

NAME 

DATE 2/28/14

SUPERVISOR PAB