

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

A241644921

FACILITY: UFP Technologies		SRN / ID: A2416
LOCATION: 3831 PATTERSON SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Matthew Hale , Supply Chain Manager		ACTIVITY DATE: 06/25/2018
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Bill Schnell, Manufacturing Engineering Manager because the regular contact, Matt Hale, Supply Chain Manager was on vacation.

I explained to Mr. Schnell that this was a routine, unannounced inspection to determine compliance with Opt-out Permit to Install No. 413-96A that limits the emissions of Hazardous Air Pollutants from the facility.

We were joined for the opening meeting by Kathy Galbraith, Plant Manager, Joh Hallmark, Manufacturing Manager, Brian Keenan, Maintenance Manager and Heather who is also part of the management team. They were informed of the purpose of the inspection which includes a physical tour of the facility as well as a review of recordkeeping. Upon my arrival, nobody at the facility had access to recordkeeping that is the responsibility of Mr. Hale. I informed the management team that other people at the facility need to have access to that information at all times. I suggested keeping the records on a shared drive for others to be able to access and they agreed to make it accessible in the future.

#### FACILITY DESCRIPTION

The UFP Technologies facility produces custom-engineered components, specialty packaging and a variety of end products out of foam, molded fiber, plastics, films and adhesives. The facility operates equipment to process these materials, including heat presses, hot wire cutting, three spray booths, thermoforming equipment and three ink-pad printers. Isopropyl alcohol is used around the facility for cleaning and wiping. Approximately 200 people are employed at the facility which operates two 10 hour shifts, 4-days a week.

#### COMPLIANCE EVALUATION

Mr. Schnell and Mr. Keenan walked me around the facility and explained the various operations.

The three spray booths will be given a new exterior shell soon and utilize a single mat filter for particulate control. Mr. Keenan indicated that they change the fabric filter on an as needed basis. We discussed proper placement of the filters to ensure no paint particulate is emitted. The three booths are exempt per Rule 287(2)(c) and usage is less than 200 gallons per month.

The three ink pad print machines were observed, which are exempt per Rule 287(2)(c), however records are not being kept at this time. This will not be cited in violation, however UPF Technologies must initiate records for these low ink volume machines.

UFP Technologies has multiple heat presses that are used to join two pieces of foam together using heat. There are also wire cutting activities that are not independently vented. These operations are exempt per Rule 286, plastic processing equipment.

The engineered components area includes vacuum forming and presses. This activity was formerly conducted by a separate company housed in the same facility. Since the last AQD inspection, UFP now owns that company and conducts those activities.

UFP conducts water jet cutting that is used on thicker foam, and that activity is internally vented.

Two exempt parts washers are onsite and are maintained by Safety Kleen.

Miscellaneous wiping and cleaning activities take place at the facility, and employees utilize isopropyl alcohol (IPA) at various stations. According to Mr. Hale, 2017 records show that 577 gallons were purchased. If one gallon of IPA weighs 6.54 lbs, then the emissions associated with 577 gallons would be 3,773.58 pounds. It appears as though this IPA usage would qualify for the Rule 290 exemption, if appropriate emissions records are maintained as required. The AQD guidance on recordkeeping for Rule 290 will be provided to the company.

Opt-out PTI No. 413-96A

This Opt-out permit covers all process equipment at the stationary source, including equipment covered by other permits, grandfathered equipment and exempt equipment.

**FGFACILITY**

This flexible group that includes all process equipment, limits individual HAP emissions to less than 9.0 tons per 12-month rolling time period and limits aggregate HAP emissions to less than 22.5 tons per 12-month rolling time period, and requires recordkeeping to demonstrate compliance.

At the time of the inspection, UFP Technologies was not maintaining records of HAP emissions. This is a violation of Opt-out PTI No. 413-96A, Special Condition No. 2.4. Mr. Hale did put information together that indicates that emissions are low. However, the lack of recordkeeping will be cited in a Violation Notice.

**MAERS**

The 2017 adhesive usage information received after the inspection do not match the adhesive usage submitted in the MAERS report. Additionally, the ink usage and the IPA usage should be added as emission units in the next round of MAERS.

**CONCLUSION**

UFP Technologies was in non-compliance at the time of the inspection.

NAME 

DATE 7-9-18 SUPERVISOR 