

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

A586752396

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| FACILITY: Polyply Composites, LLC | SRN / ID: A5867 |
| LOCATION: 1540 MARION Street, GRAND HAVEN | DISTRICT: Grand Rapids |
| CITY: GRAND HAVEN | COUNTY: OTTAWA |
| CONTACT: Daniel Lockard , Technical Director | ACTIVITY DATE: 02/11/2020 |
| STAFF: Chris Robinson | COMPLIANCE STATUS: Compliance |
| SUBJECT: FY '20 on-site inspection to determine the facility's compliance status with respect to PTI's 244-79, 255-92, 551-92A and any other applicable air quality rules and regulations. | |
| RESOLVED COMPLAINTS: | |

AQD Staff Chris Robinson (CR) met with Polyply Composites (Polyply) staff Daniel Lockard, Technical Director, and Kip Downhour, General Manager, for a scheduled unannounced onsite inspection. Polyply is located at 1540 Marion Street in Grand Haven, Michigan. The perimeter of the building was surveyed for odors and visible emissions. None were observed. The intent of the visit was relayed along with identification.

Facility Description

Polyply still produces their own Sheet Mold Compound (SMC) but now purchases the Bulk Mold Compound (BMC) from an outside vender. Both the SMC and BMC are used to produce a variety of products by placing the cured material in one of approximately 16 press molds. The facility also maintains a pultrusion machine. Cleanup is conducted with liquid styrene which is contained in 500-gallon totes, and both waste and new styrene is added to the SMC process for use.

Compliance Evaluation

Polyply operates under three Permits; Permit to Install No's. 244-79, 255-92 and 551-92A. Permit to Install 551-92A is an Opt-out permit, limiting facility-wide VOCs to 9.0 tons per 12-month rolling time period. Because the only volatile emissions from this facility are in the form of styrene and styrene is both a HAP and VOC, this permit is also limiting HAPs. However, this may not hold true if the facility makes any process and/or chemical changes that contain additional types of HAPs.

PTI 244-79

This permit has two (2) special conditions. Visible emissions must be less than or equal to 20% and per Rule 44, at the time this permit was issued, the particulate emissions rate from the dust collector shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases. The facility has two bag houses, one is vented internally and the other is a small externally vented unit. Per conversations with both Mr. Lockard and Mr. Downhour and the permit application, it's unclear which of the two baghouses this permit is for. Neither baghouse appears to be new. Since no visible emissions were observed from either unit CR left a copy of each permit with Mr. Lockard and left it up to Polyply staff to properly identify the baghouses. Compliance with the PM emission rate is demonstrated by properly operating and maintaining the units. Both were operating during this inspection and appeared to be in good operating condition.

PTI 255-92

This permit has four (4) special conditions. A PM emission rate limit of 0.1 pounds / 1,000 pounds of exhaust gasses, no visible emissions, a requirement to not operate the equipment unless the dust collector is installed and operating properly, and a requirement to dispose of collected air contaminants in a manner which minimizes the introduction of air contaminants to the outer air. As discussed above there were no visible emissions from either baghouse and both appeared to be maintained and operating properly. Per discussions with Mr. Lockard and Mr. Downhour none of the equipment is operated without proper control (baghouse). Both baghouses are located inside reducing the risk of allowing collected contaminants from being introduced to the outside air during cleaning.

PTI 551-92A

Poly ply is subject to a VOC emission limit of 9.0 pounds per hour (pph) and 9.0 tons per year (tpy). The pph limit is based on a "Test Method" however there are no performance test requirements in the permit except for General Condition 13, which is cited as the "Testing/Monitoring Method". General Condition 13 only requires performance testing if requested by the Department. At this time testing is not being requested. Emission calculations/records were provided and are attached. Based on these records the Rolling 12-month calculation as of 2/4/2020 was 4.88 tons of Styrene (VOC & HAP), which is below the 9.0 tpy limit.

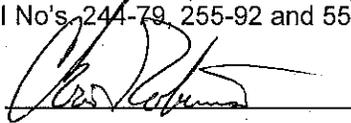
Special Conditions 1.2 through 1.4 of this PTI require covers to be installed and operating on the mixing, storage and application equipment for BMC, SMC, and pultrusion. Most of the covers consist of cardboard. All were installed and closed during this inspection. No SMC mixing was being conducted during this inspection. The BMC is purchased now instead of being produced. Some of the SMC & BMC molds were operating along with the pultrusion machine.

Special Condition 1.5 requires the facility to determine the VOC content, water content and density of any raw materials used utilizing method 24 testing. The facility requested and was given approval to use manufacturer formulation data sheets. Examples were provided and are attached. Records were also provided during the inspection. Records include information required by SC 1.6(a-d), which includes usage rates, VOC content, monthly emission rates and annual emission rates. Annual emission rates are based on a 12-month rolling time period.

Compliance Determination

Based on the observations made at the time of this inspection and a subsequent records review, Polyply appears to be in compliance with applicable air quality rules and regulations including the requirements specified in PTI No's. 244-79, 255-92 and 551-92A.

NAME



DATE

2/25/2020

SUPERVISOR

