

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

A586770139

FACILITY: Polyply Composites, LLC		SRN / ID: A5867
LOCATION: 1540 MARION Street, GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Jon Newmyer , General Manager		ACTIVITY DATE: 11/15/2023
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY '24 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:		

On November 15, 2023, staff Chris Robinson (CR) and Dillon King (DK) from Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) conducted an inspection at Polyply Composites (SRN A5867) located at 1540 Marion Street in Grand Haven Michigan. The purpose of this inspection was to determine this facility's compliance with applicable state and federal air quality rules and regulations including Permit to Install No. 244-79, 255-92, and 551-92A. Prior to entry AQD staff surveyed the perimeter of the building for odors and visible emissions. No visible emissions were observed; however, a slight styrene odor was noted.

AQD staff met with Jon Newmyer, General Manager. The intent of the visit was relayed, and identification was provided. The PTI was first discussed followed up by a walkthrough of the facility and then a brief post meeting. Records were provided during the post meeting.

Facility Description

Polyply produces their own Sheet Mold Compound (SMC) but 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 (PTI) No. 244-79, 255-92 and 551-92A. Permit to Install 551-92A is a Title V Opt-out permit, limiting facility-wide volatile organic compounds (VOCs) to 9.0 tons per year (tpy), based on a 12-month rolling time period. Because the only volatile emissions from this facility are in the form of styrene and styrene is both a Hazardous Air Pollutant (HAP) and VOC, this permit also limits facility wide HAPs (Styrene) to 9tpy. However, this would not be true if the facility decides to use different HAP containing materials.

PTI 244-79

This PTI is for a dust collector with cyclone fan that vented externally. This unit was removed sometime after AQDs' previous inspection conducted on February 11, 2020. CR discussed voiding this PTI with Mr. Newmyer and he requested to do so. CR made the request to Permits Section on December 15, 2023.

PTI 255-92

The facility operates a dust collector that is used for cutting the plastic components they manufacture to size. This unit looks to be newer than 1992 but it's unclear if PTI 255-92 covers this dust collector or if it was for another one that is no longer onsite. Either way, the currently installed

dust collector is vented internally, and the facility has chosen to void this PTI and operate it under Rule 201 permitting exemption Rule 285(2)(l)(vi)(B). CR submitted the void request to Permits Section on December 15, 2023. The dust collector currently in place appears to be maintained well.

PTI 551-92A

Polyply is subject to a VOC emission limit of 9.0 pounds per hour (pph) and 9.0 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 emissions for styrene, as of 11/10/2023, was 5.01 tons, 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. Covers consisted of cardboard but the facility is in the process of having molded plastic lids made to replace the cardboard. All were on except for the mixers but no SMC mixing was being conducted during this inspection. Mr. Newmyer was informed that the lids must be on the mixers when they are operating. 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. Records provided included information required by SC 1.6(a-d), which includes usage rates, VOC content, monthly emission rates and annual emission rates.

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The facility's 2021 emissions were reported on March 10, 2023, and reviewed by AQD on March 30, 2023. Emissions reported are based on percent styrene from manufactures technical data assuming 100% used is emitted. No changes were made to database as submitted.

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. 551-92A.

NAME  _____DATE 12/15/2023SUPERVISOR  _____