

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

N304224623

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| FACILITY: GRAND RAPIDS FOAM TECHNOLOGIES | SRN / ID: N3042 |
| LOCATION: 1700 Alpine Ave NW, GRAND RAPIDS | DISTRICT: Grand Rapids |
| CITY: GRAND RAPIDS | COUNTY: KENT |
| CONTACT: Rich Wilson , Plant Manager | ACTIVITY DATE: 01/09/2014 |
| STAFF: Jenifer Dixon | SOURCE CLASS: MINOR |
| SUBJECT: The purpose of this inspection was to conduct a scheduled inspection and to determine compliance with all applicable Air Quality Rules and Regulations. The facility does not currently have any Air Quality permits, but does utilize some permitting exemptions. | |
| RESOLVED COMPLAINTS: | |

This was an unannounced inspection. A copy of the "Environmental Inspections: Rights and Responsibilities" was supplied.

The purpose of this inspection was to conduct a scheduled inspection and to determine compliance with all applicable Air Quality Rules and Regulations. The facility does not currently have any Air Quality permits, but does utilize some permitting exemptions.

JD arrived in the area of the facility at 10:50PM and left at approximately 12:20PM on January 9, 2014. No excess odors or opacity were observed during the inspection time. Mr. Rich Wilson, Director of Fabrication Operations, provided pertinent information regarding the facility and the operations contained therein.

Grand Rapids Foam Technologies (GRFT) is a manufacturer of covered foam seats and stretcher mattresses, as well as other foam parts. The primary operations at the facility are the CNC type cutting of blocks (buns) of polyurethane foam, several adhesive booths, and assembly operations, which includes sewing and attaching of material covers.

The polyurethane foam arrives at the facility, primarily in large blocks, that are cut down via CNC machining operations. GRFT can cut shapes and sizes for all types of products. These operations do not create particulate matter and are therefore, not controlled and do not have any stacks.

The adhesive operations at GRFT utilize the same type of adhesive. The purpose of the adhesive is to affix separate pieces of foam together. The adhesive is water-based (0.0 lb/gal VOC based on EPA Method 24 test) and the MSDS is attached to this report. Because of the type of operations (adhesive application) the facility has determined which exemption is appropriate for each application station. GRFT has five adhesive stations which will be further discussed below.

Medical Mattress Station

This station is located in the main assembly room. The station was in operation at the time of the inspection. The station is a downdraft station with fabric filters that are changed on an as needed basis. The filters appeared to be in good condition. The station vents to the in-plant environment. Adhesive is delivered to the one (1) spray gun at the station from a 5 gallon tote with gravity feed. This station is exempt from Rule 201 permitting requirements under Rule 287(c).

Laminating Table

This station is located in the main assembly room and is used to adhere one piece of foam to another. The station was not in operation at the time of the inspection. The station is a downdraft station with fabric filters that are changed on an as needed basis. The filters appeared to be in good condition. The station vents to the in-plant environment. Adhesive is delivered to the station from two (2) five (5) gallon totes with gravity feed. This station is exempt from Rule 201 permitting requirements under Rule 287(c).

Deena Spray Table

This station is similar to the Medical Mattress Station and is also located in the main assembly room. The station was not in operation at the time of the inspection. The station is a downdraft station with fabric filters that are changed on an as needed basis. The filters appeared to be in good condition. The station vents to the in-plant environment. Adhesive is delivered to the one (1) spray gun at the station from a 5 gallon tote with gravity feed. This station is exempt from Rule 201 permitting requirements under Rule 287(c).

Small Parts Station

This station is located in the portion of the facility named the small parts room. The station was in operation at the time of the inspection. The station is a downdraft station with fabric filters that are changed on an as needed basis. JD was able to observe the filters being changed during the inspection. The station vents to the in-plant environment. Adhesive is delivered to the seven (7) spray guns at the station from a 30 gallon tote with gravity feed. This station also uses an activator which accelerates the time needed for the adhesive to adhere the parts together. The MSDS for the activator is also attached to this report. This station is exempt from Rule 201 permitting requirements under Rule 287(c).

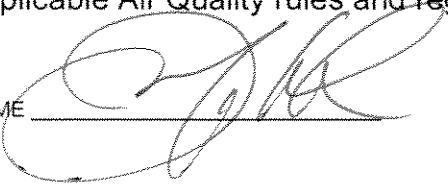
Panel Booth

The Panel Booth is located in the sewing room. The booth was not in operation at the time of the inspection. This booth is a more traditional stand up booth as opposed to the table type stations found in the rest of the facility. This booth also vents to the in-plant environment with fabric filters that are changed on an as needed basis. The filters appeared to be in good condition. This booth is primarily used to coat larger panels that are hung when the adhesive is sprayed on. This station is exempt from Rule 201 permitting requirements under Rule 287(c).

The facility also has a large natural gas fired boiler that is oversized for the current operations. However the cost to remove the unit completely and replace it with a smaller one is excessive. The boiler is rated at 23,0000 btu/hr and is exempt from Rule 201 permitting requirements under Rule 282(b)(i).

NOTE: There was a lot of time between the physical inspection of the facility and the completion of this report as JD and Mr. Wilson worked through some of the Rule 201 permitting exemptions and the records involved with them. The facility is on the right track now. Sample records are attached.

Based on observations made at the time of the inspection and subsequent records review, GRFT appears to be correctly utilizing Rule 201 exemptions and is in compliance with all applicable Air Quality rules and regulations. No further action is necessary at this time.

NAME DATE 3/24/12 SUPERVISOR PAB

