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

FACILITY: Flexfab Horizons International		SRN / ID: N3569
LOCATION: 102 COOK RD, HASTINGS		DISTRICT: Grand Rapids
CITY: HASTINGS		COUNTY: BARRY
CONTACT: Patricia Modreske, EHS Specialist		ACTIVITY DATE: 09/23/2015
STAFF: Steve Lachance	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspectio	n for FY '015	
RESOLVED COMPLAINTS:		

This was an unannounced, scheduled inspection. SL presented himself to the receptionist at this location at about 10:15 AM, Wednesday, September 23, 2015. SL learned that the former AQD contact was no longer with the company; and also that the current contact, "Pat" was located at the other facility on M-43. She attempted to contact Pat via phone, but was unsuccessful. SL simply relocated to the M-43 location. Again unsuccessful, SL left a voice-mail for Ms. Modreske on his cell phone and turned attention to another facility in Hastings. Upon completion of those activities, at about 11:20 AM or so, SL was in contact with Ms. Pat Modreske, EHS Specialist for the Flexfab facilities. Inspection activities commenced at about 11:30 AM at the M-43 facility; and then the physical inspection of this Cook Road facility was appended to discussions/inspection activities at the M-43 facility, starting at about 1:15 PM. Ms. Modreske and Mr. Mark Rushford (Maintenance Supervisor) accompanied SL during this inspection.

No odors or visible emissions (other than periodic condensed water vapor from the autoclaves; see below) attributable to the facility were observed upon entry (AM or PM.)

Much of the discussion and detailing of the inspection (nature of business, how emissions are calculated, how records are kept, etc.) are outlined in CA\_A016331376 for the Flexfab facility on M-43. There are no permits for this facility, which was erected in about 1994. Many of the processes are the same here as described for the M-43 (A0163) facility. The main difference is that there is a "large" natural gas-fired boiler on this facility that serves a number of autoclaves used to cure the silicone products. The autoclaves release steam cyclically (as noted from off-site observations on multiple occasions.) With respect to Boiler MACT/GACT requirements, this is a 6.276 mmBtu/hr natural-gas-fired boiler at a minor (area) source of HAPs; and so is not regulated by the MACT/GACT. This boiler (as well as multiple curing ovens that have lesser heat inputs) is exempt from permitting per Rule 282(b)(i).

The facility maintains and provided records of formaldehyde emissions (<u>attached</u>) from the silicone curing. Based on total amount of product used on-site, emissions are less than 20 lbs/month; exempt per Rule 290. See the aforementioned report (CA\_A016331376) for details on the emission factor used for this demonstration.

## SUMMARY

SL concludes that this facility is in compliance with applicable air use rules and regulations.

ATTACHMENT

**Cook Road Formaldehyde Emissions** 

DATE 9/29 SUPERVISOR