

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

N529628359

FACILITY: ARVRON INC		SRN / ID: N5296
LOCATION: 4720 CLAY AVE SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Doug Heyboer, President		ACTIVITY DATE: 12/17/2014
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules and regulations and PTI No. 238-94A. DP drove around the area prior to entering the facility. There were no odors and fugitive emissions. DP met with Doug Heyboer, President, and after a brief introduction and discussion, explained the purpose of the inspection and reviewed the Environmental Inspection brochure.

They have 36 employees working one shift five days a week making foam block from polystyrene foam beads. They use 3 storage bins that lead to the expander and 8 aging bags hold the expanded beads between 12-26 hours before it is molded. After it is molded the blocks are aged in heated rooms at 130-150°F until they're cut using hot wire cutters.

They are going to be down over the Christmas holiday to make repairs on the expander and mold equipment. Since the equipment is ~20 years old, they are looking at possibly updating with new equipment and asked if that would require a permit. DP verified with Andy Drury in the AQ Permit Section that it would require a permit modification and sent Doug an e-mail with that recommendation.

All records are maintained by Patti Lane, who was not available at the time of the inspection, however, records were submitted on December 18, 2014, see attached.

SPECIAL CONDITIONS

14. The VOC emission rate from the processes shall not exceed any of the following limits:

- a. 5.6 pounds per 100 pounds of EPS beads processed (based on a twelve month rolling average). The highest month was September at 3.98lb/100lb of EPS beads; (see attached records).
- b. An average of 15,841 pounds per month (based on a twelve month rolling average and actual monthly pre-expansion throughput data). The highest month was October at 13568 pounds per month average; (see attached records).
- c. 95.0 tons per calendar year (based on actual annual pre-expansion throughput data). 77.2 tons through November 2014; (see attached records).

15. Rules 1001, 1003 and 1004 - Verification of VOC emission rates from the processes by testing, at owner's expense, in accordance with Department requirements, may be required. The testing shall be conducted within 60 days following the receipt of the written notification of the requirement. Verification of emission rates includes the submittal of a complete report of the test results. If testing is required, a complete test plan must be submitted to the Air Quality Division. The final plan must be approved by the Division prior to testing and a complete report of the test results must be submitted to the Division within 60 days following the last date of testing. No additional testing was required as part of this compliance inspection.

16. Applicant shall not process more than 15 tons of material in the pre-expanders during any eight hour period. A written record of the amount of material processed each hour shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. The equipment operates at a maximum of 3500 pounds per hour so at maximum production they can only run at 14 tons. Records presented are for their typical operation schedule of 10 to 12 hours a day (see attached records). DP suggested that if they come in for a new PTI this condition be evaluated to better reflect their operational schedule.

17. Applicant shall determine the VOC content, as shipped, of product from the processes. Applicant shall follow a sampling schedule approved by the District Supervisor, Air Quality Division. The samples shall represent the full range of VOC content of EPS beads used in the processes and shall support an estimate of the production-weighted average VOC content of product from the processes. Applicant shall use sampling and analysis methods approved by the District Supervisor. Results of product sampling and analysis shall be submitted to the District Supervisor in an acceptable format within 30 days following the receipt of analytical results. A written record of all VOC content determinations shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. Testing and sampling were conducted in 1996 as part of PTI Application No. 238-94A and also required as part of Consent Order AQD No. 14-1996, which was terminated January 29, 2001. Attached is a copy of the only record in the AQ files (current and voided files) regarding testing. After a complete review of the files no additional testing was ever conducted and a sampling schedule was never submitted. Previous AQ staff never requested any additional testing or documentation. DP contacted the company regarding this requirement and they could not provide any additional documentation (see attached e-mail). DP notified the company that whether or not a new application is submitted testing results must be submitted by Feb 6, 2015. The company submitted the attached testing results on February 6, 2015. This testing will be included with the new application they will be submitting shortly. Testing results were received on February 6, 2015.

18. Applicant shall keep a written record for each calendar month of the throughput at pre-expansion for each lot of EPS beads. This record shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. Records are being maintained, see attached.

19. Applicant shall keep a record of the pounds of VOC per 100 pounds of EPS beads as received, for each lot of EPS beads used in the processes. This information shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. Records are being maintained, see attached.

20. Applicant shall limit the monthly average throughput of EPS beads at pre-expansion as specified below. Records submitted the company appears to be performing the calculations accurately.

21. Applicant shall calculate and keep a record for each calendar month of the pounds of VOC per 100 pounds of EPS beads used at pre-expansion and of the actual VOC emissions from the processes (based on throughput at pre-expansion), using the method detailed in Appendix A. This information shall be compiled for each calendar quarter and shall be submitted to the District Supervisor in an acceptable format within one calendar month following the end of the quarter in which the data were collected. After information for two quarters of operation has been submitted to the District Supervisor, the District Supervisor may approve alternate reporting procedures. Regardless of the reporting procedures in use, the record shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. Alternate reporting approved; monthly records kept onsite

Based on the physical inspection and the records provided the facility appears to be in compliance with state and federal Air Quality rules and regulations and PTI No. 238-94A .

NAME



DATE 3.5.15

SUPERVISOR

