

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

N551844439

FACILITY: GHSP HART PLASTICS		SRN / ID: N5518
LOCATION: 1500 INDUSTRIAL PARK DR, HART		DISTRICT: Grand Rapids
CITY: HART		COUNTY: OCEANA
CONTACT: Greg Kwast, Technical Service Manager		ACTIVITY DATE: 05/22/2018
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY '18 on-site inspection to determine the facility's compliance status with PTI no. 187-95 and any other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Chris Robinson (CR) conducted a scheduled unannounced inspection of GHSP Hart Plastics, located at 1500 Industrial Park Drive, Hart MI from approximately 10:00am to 11:45am. Proper AQD credentials and a business card were presented to Mr. Greg Kwast, Technical Service Manager and Mr. Kevin Buchberger, Maintenance and Facility Team Leader. Both Mr. Kwast and Mr. Buchberger provided pertinent information as well as a complete tour of the facility. No odors or visible emissions were observed at any time during this inspection.

#### Facility Description

GHSP is primarily a plastic injection mold facility that manufactures and assembles automobile gear shift mechanisms. Operations are conducted out of two contiguous buildings. The main building is located at 1500 Industrial Park Drive which houses 22 plastic mold injection machines, an assembly area, shipping/receiving and administration. The second building is located at 1550 Industrial Park Drive which is currently being used for shipping/receiving, operation of one (1) plastic mold injection machine and assembly area, as well as a small MAXFLOW Air spray booth with HVLP sprayer and carbon filtration system for small coating operations, which was installed in 2016. Miscellaneous plastic injection and assembly equipment is also stored in this building. The plastic mold injection equipment appears to be exempt under Rule 336.1286(2)(b) for "**Plastic Injection, compression, and transfer molding equipment and associated plastic resin handling, storage, and drying equipment**". The MAXFLOW Air spray booth appears to be exempt under Rule 336.1287(2)(c) for surface coating operations with a usage of less than 200 gallon/month. Booth emissions are captured in an attached carbon filter and vented to the in-plant environment. Monthly records were provided. GHSP used approximately 0.492 gallons in 2016 (includes removed equipment discussed below), 17.4 gallons in 2017 and zero gallons thus far in 2018.

#### PTI No. 187-95 Compliance Evaluation

Equipment: Two (2) dry filter type spray booths, one drying oven, and associated mix room.

The November 10, 2009 inspection report noted that one of the two spray booths had been removed prior to the inspection. During the May 22, 2018 inspection CR was informed that the remaining equipment was removed in 2016 and the area was used to expand the assembly area, which was visually confirmed during the facility tour. CR informed both Mr. Kwast and Mr. Buchberger that the permit will need to be voided unless the equipment is to be reinstalled. An email, which is attached, provided by Mr. Buchberger on 5/23/2018 indicates that the equipment has been permanently removed and GHSP is requesting to void PTI 187-95. CR submitted the void request to Sue Thelen on 5/23/2018.

Although special condition (SC) number 18 of the PTI requires records to be kept for only two (2) years, Mr. Kwast provided 2016 through 2018 records of hours of operation and emissions of Volatile Organic Compounds (VOCs) for both the old equipment and the new MAXFLOW Air spray booth. Only water-based coatings are applied in the new spray booth and it is equipped with a carbon filtration system. Even though this is not covered in the facility's PTI the records indicate that GHSP has remained well below the 5.4 lbs./hr limit specified in SC 16. During the initial startup of the plastic injection presses, GHSP utilizes an aerosol-based mold release call "Rocket Release" manufactured by Stoner, SDS attached, which contains approximately 60-80% VOCs.

This process appears exempt per Rule 287(2)(c) for "**a surface coating process that uses only hand-held aerosol spray cans**". GHSP is required by SC 22 of the PTI to keep all materials containing VOCs, including solvents and cleanup wastes in closed containers except when filling or emptying. In addition to the mold release, GHSP uses a foam degreaser, which contains approximately 5.3% VOCs. The degreaser is maintained in a closed cold cleaner, discussed below, and the mold release is stored in a fire proof container.

GHSP has one (1) cold cleaner containing S-722 Foaming Degreaser, SDS attached. This unit appears to meet the definition of a cold cleaner: **"a tank containing organic solvent with a VOC content of 5% or more, by weight, and at a temperature below its boiling point that is used to spray, brush, flush, or immerse metallic and/or plastic objects for cleaning or degreasing"**. Therefore, the cold cleaner appears to be exempt from permitting under rule 281(2)(h) for **"cold cleaners that have an air/vapor interface of not more than 10 square feet"**.

**Conclusion**

Based on observations made during this inspection, GHSP appears to be in compliance with PTI No. 187-95 and other applicable air quality rules and regulations

NAME 

DATE 5/31/2018

SUPERVISOR 