

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

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| FACILITY: HUNTINGTON FOAM LLC | | SRN / ID: N6976 |
| LOCATION: 1323 MOORE DRIVE, GREENVILLE | | DISTRICT: Grand Rapids |
| CITY: GREENVILLE | | COUNTY: MONTCALM |
| CONTACT: Thomas Winks , Plant Manager | | ACTIVITY DATE: 11/19/2018 |
| STAFF: Adam Shaffer | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Scheduled unannounced inspection. | | |
| RESOLVED COMPLAINTS: | | |

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Huntington Foam LLC (HF) facility located in Greenville, MI at 10:14am on November 19, 2018 to complete a scheduled unannounced inspection. The weather conditions at the time of the inspection were partly cloudy, low 30's °F and winds from the south/southwest at 5-10mph. Prior to entering the facility offsite odors and visible emissions readings were completed. Steam was observed coming from stacks on site. What appeared to be a slight plastic odor was noted to the east of the property.

Facility Description

HF is an expanded polystyrene (EPS) foam shape processing facility. The facility is a synthetic minor source of volatile organic compounds (VOCs) and is in operation with one Opt Out Permit to Install (PTI) No. 156-01C.

Offsite Compliance Review

- The facility is in operation with two boilers that are subject to New Source Performance Standards (NSPS) Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Additional information regarding the boilers will be discussed later and based on HF being subject to NSPS Subpart Dc they are a Category II Fee subject facility. Due to the timing of the inspection, the 2018 Michigan Air Emissions Reporting System (MAERS) Report has not been submitted by HF at this time. The 2017 MAERS Report was reviewed. For 2017, 1,678,673 lbs of beads were processed and approximately 24.64 tons of VOCs were emitted from EU02000. The 2017 MAERS Report was concluded to be acceptable.

Compliance Evaluation

Upon entering the site, AQD staff AS met with Mr. Thomas Wink, Plant Manager, who provided a tour of the facility, answered site specific questions and provided requested records.

Opt Out PTI No. 156-01C

EU02000

This emission unit is for the expandable polystyrene foam molding line consisting of two pre-expanders (a primary and a back-up), mold machines, and raw material, intermediate product, and final product storage.

During the course of the inspection the various stages of this emission unit were observed. The process starts with two boilers used for steam production. Steam produced then goes into one of two pre-expanders. Once the beads are expanded to the correct size they are placed in holding bags and aged appropriately. Once the aging process is completed the beads are then sent to the appropriate molding machine on site where they are pressed and turned into the desired consumer shape. Following the molding machines the products are placed in an unheating oven. Once completed the parts are then stored before being shipped offsite.

It was noted during the inspection that HF also utilizes expanded polypropylene and polyethylene beads to create consumer products. Ten molding machines total were observed during the inspection that process polystyrene, polypropylene, and/or polyethylene beads. When questioned on the potential emissions, HF staff stated that polypropylene and polyethylene beads contain no VOC emissions. Holding bags for polypropylene beads were observed onsite. Once the beads were aged to the desired length of time, they are transported to the appropriate molding machine. This was concluded to be acceptable.

This emission unit is subject to a VOC emission limit of 85 tons per year (tpy) per a 12-month rolling time period. Records were reviewed on site with 2018 records also being provided following the site inspection. At the time of the inspection, the 12-month rolling totals had not been calculated for 2018 yet, though the remaining data was completed. The 12-month rolling totals were completed and provided in a timely manner. Moving forward, HF shall keep 12-month rolling totals of emissions up to date in a timely manner. This was stated to HF staff in a phone conversation on 12/06/18. Spreadsheet errors were identified upon review and brought to the attention of HF with corrected records resubmitted. For October 2018, the 12-month rolling total was 23.79 tpy of VOCs, which is well within the permitted limit. Previous 12-month rolling totals reviewed were also well within the permitted limit. Additionally, HF is subject to a 490 pound per day (ppd) limit of VOCs. Records were requested and reviewed back to November 2017. Several errors were identified; however, it was concluded that HF appears to be meeting the ppd VOC limit.

Per Special Condition (SC).VI.1.a-d, HF shall keep track of VOC contents of each lot of EPS beads used, daily pounds of EPS beads used, VOC emission calculations determining the daily VOCs emitted, and the 12-month rolling VOC emissions in tpy. Records were reviewed back to November 2017 and it was concluded that overall HF appears to be adequately keeping track of the appropriate records. Two stacks are listed in association with PTI No. 156-01C and were observed during the site inspection. Though the dimensions were not measured, they appeared to be consistent with what is listed in PTI No. 156-01C. At the time of the inspection, the stacks were observed venting unobstructed vertically.

Additional Observations

- Two boilers were observed during the inspection with the sizes being 16.74 MMBtu/hr and 16.37 MMBtu/hr in size and were installed in 2010 and 2014 respectively. The two boilers are subject to NSPS Subpart Dc. Initial notifications had been previously submitted for both boilers. Per NSPS requirements, monthly gas usages shall be kept for each boiler. HF is keeping track of monthly combined gas usage for both boilers and has an hourly meter for each boiler to track hours of operation. The total hours per year for each boiler are then used in calculating the monthly gas usage for each boiler per month which was reflected in the 2017 MAERS Report supporting documents. After further review, this appears to be acceptable. It was concluded that the two boilers appear to be in compliance with NSPS Subpart Dc rules. The two boilers appear to be exempt per Rule 282(2)(b)(i).

Conclusion

Based on the facility walkthrough, observations made, and records received, HF appears to be in compliance with PTI No. 156-01C and applicable air pollution control rules.

NAME Adam F. Shaff

DATE 12/10/18

SUPERVISOR 