

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

N742841527

FACILITY: GRAND RAPIDS FOAM TECHNOLOGIES		SRN / ID: N7428
LOCATION: 2788 REMICO SW, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Tom Brenner , Director of Molded Operations		ACTIVITY DATE: 09/06/2017
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Steven A. Busch, Director of Human Resources, Tom Brenner, Director of Molded Operations and Kerry Covey, Chemical Engineer.

FACILITY DESCRIPTION

Grand Rapids Foam Technologies (GRFT) is a manufacturer of polyurethane foam parts, using a two part reaction within closed molds moved by conveyor. GRFT operates pursuant to Opt-out Permit to Install No. 11-05A. This permit covers four foam parts manufacturing lines. Since issuance, the equipment permitted as Line 4 has been removed. Additionally, a Rule 290 exempt line has been added that is currently for small jobs and R & D work. A second Rule 290 emission unit is used for emissions generated plant wide that originates from a shared drum in the plant.

COMPLIANCE EVALUATION

During the initial discussions, I spoke with Mr. Brenner and Ms. Covey about the permit. It currently limits VOC from the four (3) mold lines to 73.0 tons of Volatile Organic Compounds (VOC). However, in addition to the mold lines they have two Rule 290 exempt emission units which each have the potential to emit of 6 tons VOC. These added together put the facility-wide PTE at 85 tons of VOC. Because the max allowed before becoming a major source is 100 tons of VOC, GRFT basically could add 2 more Rule 290 lines without going over the threshold.

FG-MOLDLINES

The flex group has a total VOC limit of 73.0 tons per 12-month rolling time period for the existing three lines. Reported VOC emissions for the three lines for the 12-month period ending in August are 16 tons. EU-LINE1 is limited to 16.0 tons per 12-month rolling time period. Reported VOC emissions for the 12-month period ending in August are 4.44 tons. EU-LINE2 is limited to 16.0 tons per 12-month rolling time period. Reported VOC emissions for the 12-month period ending in August are 9.59 tons. EU-LINE3 is limited to 20.0 tons per 12-month rolling time period. Reported VOC emissions for the 12-month period ending in August are 2.6 tons. EU-LINE4 is limited to 42 tons per 12-month rolling time period. EU-LINE4 has been removed.

During the inspection, it was noted that one square of the EU-LINE3 filter bank was missing. Mr. Brenner had the line stopped immediately so that a filter could be inserted. We discussed the importance of the filter placement and how that can be a violation if not corrected. Each line is equipped with HVLP guns that are tested regularly to ensure the psi is correct.

The permit states that the permittee shall determine the VOC content etc. of any mold release, paste wax or adhesive used based on Method 24, unless prior written approval has been received. Upon first receiving the permit, the permittee had the materials tested via Method 24. However, no further testing has been conducted. The permit doesn't establish how often the materials need to be tested, however AQD would like to see all new materials tested prior to being put in use. We discussed this and they will ask to use formulation data to make it clear going forward that they don't plan to test additional materials. A request to utilize formulation data has been received. The information required to constitute formulation data was relayed via e-mail, specifically identifying the language in the permit.

There have been no reported changes to any stacks at the facility.

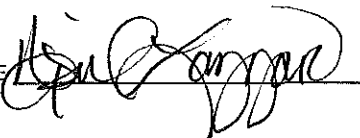
EXEMPT EQUIPMENT

Rule 290 emission unit emissions are limited to 1,000 pounds of VOC per month. Currently the maximum emissions from the SAIP emission unit for 2017 are reported at 207 pounds. Currently the maximum emissions from the Offline Machines emission unit for 2017 are reported for the month of March at 1,080 pounds. This is above the limit of 1,000 pounds. However, the next month the usage is listed as zero. I contacted Ms. Covey regarding this, and she stated that it was a spreadsheet error, which she corrected and resent to me. The corrected spreadsheet indicates compliance with Rule 290. Actual emissions for March were 594 pounds.

The recordkeeping is actually adding up the permitted and exempt equipment into one facility total. This is actually not necessary, and the two Rule 290 emission units should be reported in pounds per month. However, because emissions are totaled in pounds per material used, it was easy to look at the spreadsheet and determine monthly emissions of each emission unit for purposes of Rule 290 and is fine as is.

CONCLUSION

Grand Rapids Foam Technologies was in compliance at the time of the inspection.

NAME 

DATE 9-19-17

SUPERVISOR 