

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

P068147351

FACILITY: Innovative Polymers, Inc.		SRN / ID: P0681
LOCATION: 208 Kuntz Street, SAINT JOHNS		DISTRICT: Lansing
CITY: SAINT JOHNS		COUNTY: CLINTON
CONTACT: Sarah Sobieck , Operations Manager		ACTIVITY DATE: 11/20/2018
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled compliance inspection (PTI 70-16)		
RESOLVED COMPLAINTS:		

On November 20, 2018, I conducted an unannounced, scheduled inspection of Innovative Polymers, Inc. at 208 Kuntz Street in St. Johns. Innovative Polymers was last inspected on February 9, 2016.

Arrived: 9:20 am  
 Departed: 10:20 am  
 Weather: 24°F, wind NNW@6 MPH, sunny

Contacts:

Ms. Sarah Sobieck, Operations Manager, Phone no. 248-295-0223, sarah.sobieck@rampf-group.com  
 Mr. Terry Schafer, Production Manager, Phone no. 989-224-9500

Facility Description:

Innovative Engineering was split in 1995 with Innovative Engineering (N3273) keeping the urethane molding operations, and Innovative Polymers taking the liquid polyurethane mixing operations. Innovative Polymers, Inc. has since relocated to 208 Kuntz Street in St. Johns. Mr. Mike Molitor (owner) sold the business in July 1, 2016 to the RAMPF Group, Inc.

Innovative Polymers (now RAMPF Group, Inc.) mixes the individual liquid polyurethane "A" and "B" components (hardeners and resins) and sells the liquid polyurethane "A" and "B" components to the polyurethane molders. The applications for the products include plastic automotive components, flame retardant products such as MRI machine shrouds, decorative plastics, and any place where molded plastics are used to create products.

The facility is located in a small industrial park off of business 127 on the north side of St. Johns. It is surrounded by commercial/industrial property.

Operating hours are from 8:00 am to 4:30 pm, Monday through Friday. There are three (3) employees in the shop and eight (8) in the office.

Regulatory Overview:

Innovative Polymers (now RAMPF Group, Inc.) is a true minor source of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program. The liquid polyurethane mixing processes are permitted on Permit to Install (PTI) No. 70-16:

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)
EUROTATORS	Four rotator mixing machines with a total combined capacity of 240 gallons. Machines "A" and "B" are each 2-drum rotators with 55-gallon capacities per drum. Machines "C" and "D" are 2-pail rotators with 5-gallon capacities per pail.

Michigan Air Emission Reporting System (MAERS):

The facility does not need to report emission information.

Inspection:

I met with Mr. Terry Schafer, Production Manager. We also called Ms. Sarah Sobieck, Operations Manager. I discussed the purpose of my inspection and then toured facility operations. No changes have been made to facility operations and no new equipment has been added since the last inspection. The facility was operating during the inspection.

Liquid polymeric raw materials are received and stored in 55 gallon drums. The liquid polymeric components are mixed to customer requirements. For mixing, there are four (4) – 55 gallon drum tumblers in sets of 2, and 5 gallon pail tumblers in sets of two (2). The sales are ~95% in 5 gallon pails and less than 10,000 pounds per year of liquid polyurethanes. All materials are stored in closed containers and only opened to transfer materials in compliance with Special Conditions (SC) III.1 and 2 of PTI 70-16. There is no exhaust stacks/vents for direct venting of emissions in the mixing and storage areas in compliance with SC VIII.1.

There is an area beside a set of 55 gallon drum tumblers for addition of dry powders to the products. This includes a small and large scale with a small dust collection system that is vented to the plant air. Powders are added to the drums while mixing. The powders or fillers include chopped fiberglass, flame retardant powders, aluminum trihydrate. The process is exempt from needing a permit per Rule 284(2)(k).

There are two (2) electric ovens to keep liquid materials warm, and soften and/or melt solid raw materials in 5-gallon pails and 55-gallon drums. One oven operates at 150°F and one operates at 170°F. The ovens are not subject to Rule 201 because there are no emissions to the air.

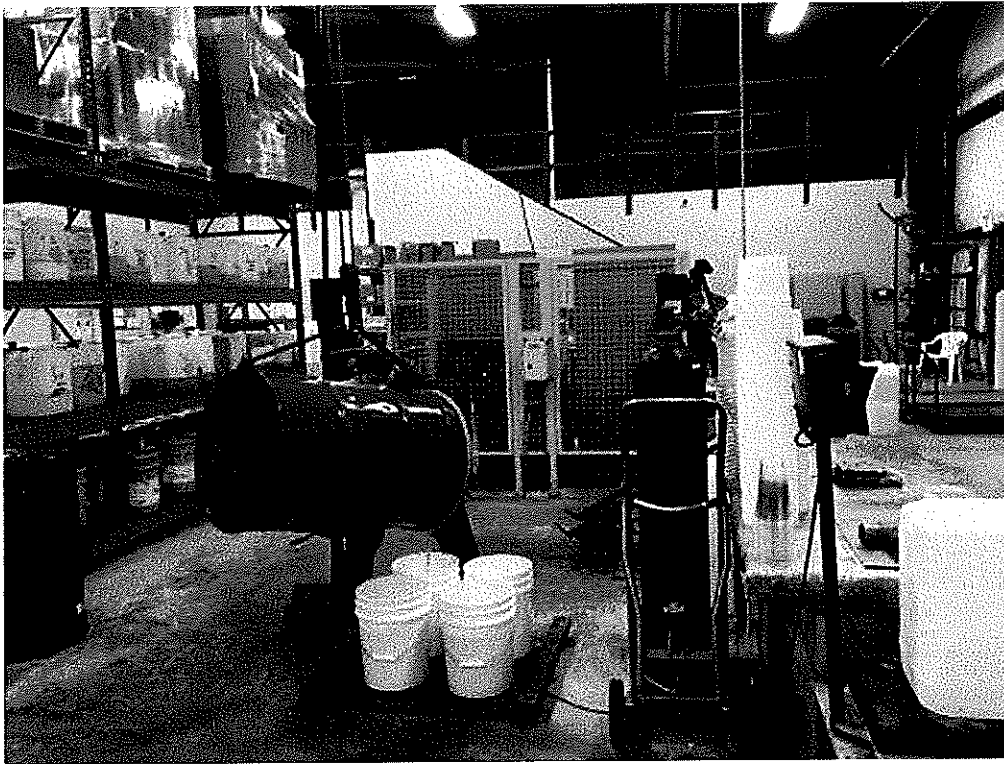
There is a small testing area to determine product performance and a materials lab. Two (2) small pressure pots using low pressure (~60 psi) and no heat are used to remove bubbles from test parts while molding. The product testing appears to be exempt under Rule 283(2)(b) and (d). A small rotocasting machine is in the area to make small hollow parts for trade shows that is not used much. It is exempt per Rule 286(2)(a).

Safety Data Sheets (SDS) are maintained for the liquid polyurethane material processed at the facility. There are thousands of SDS on record for the facility products.

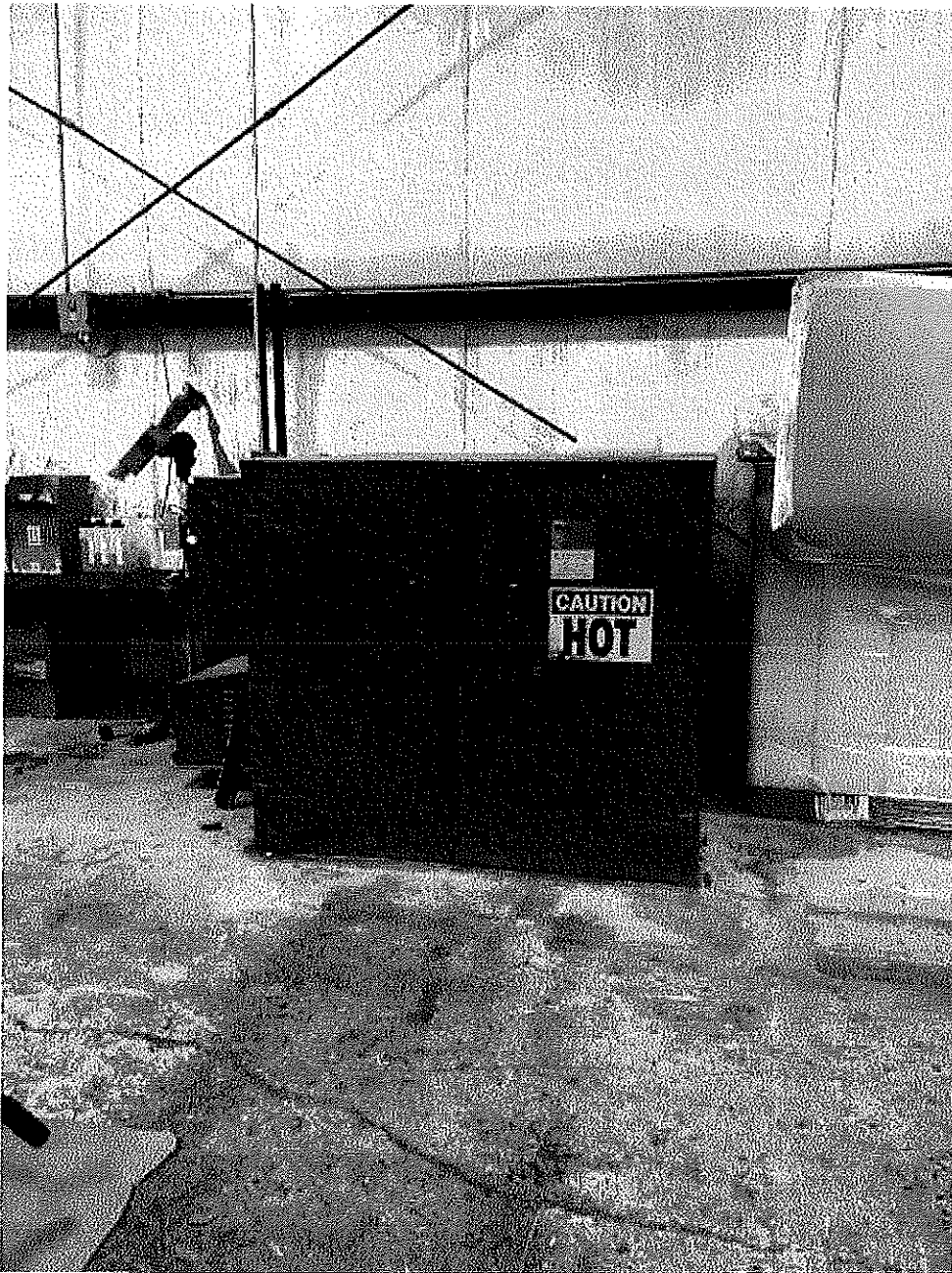
Production records for the years 2017 and 2018 are attached to this report.

Summary:

The facility appeared to be in compliance with the applicable rules and regulations, and PTI 70-16. A letter needs to be submitted for the change of ownership. Sarah was sent the information on how to make this request.



**Image 1(1)** : 55-gallon drum pouring and 2-drum rotator mixers



**Image 2(3)** : Smaller electric oven heats drums and pails. Operates at 150 degrees F.



**Image 3(5) :** 2 - 5-gallon tumbler



**Image 4(6)** : 5-gallon tumbler mixers

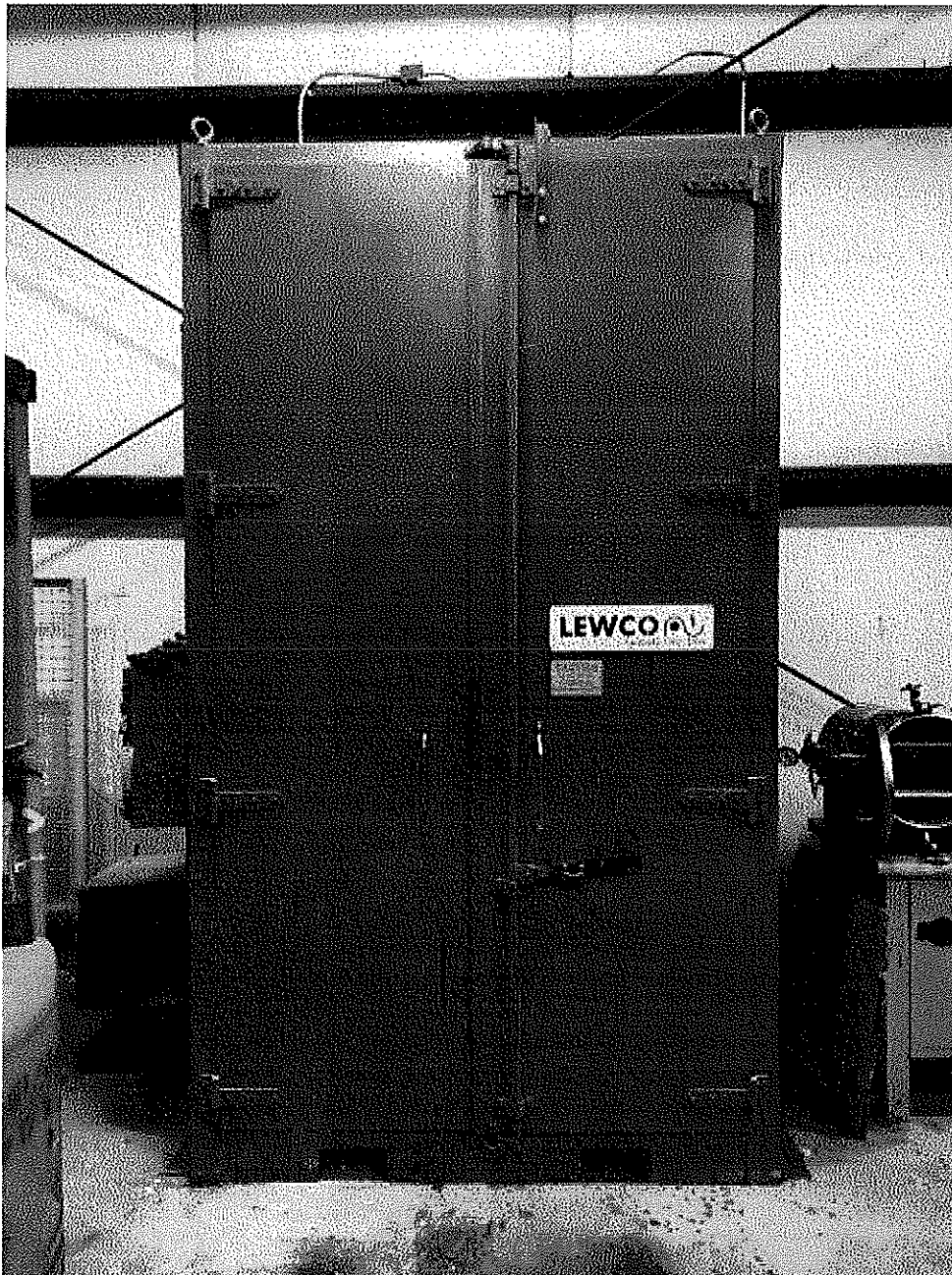




**Image 5(7) :** 55-gallon drum tumbler mixers

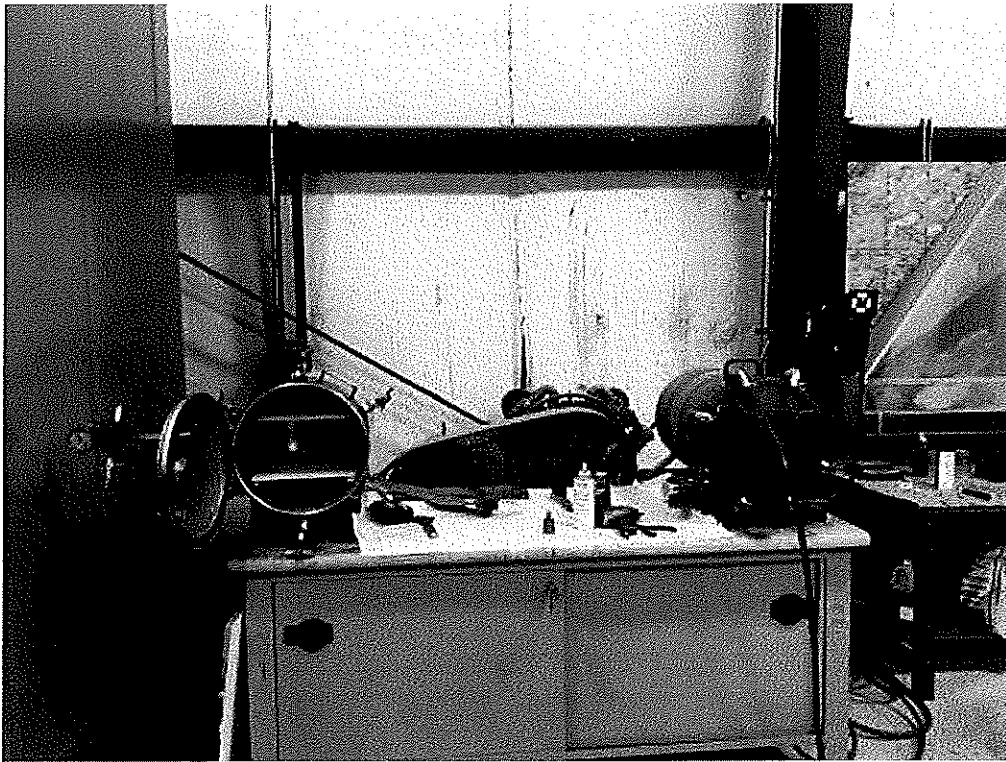


**Image 6(8) :** Powder mixing station with dust collection

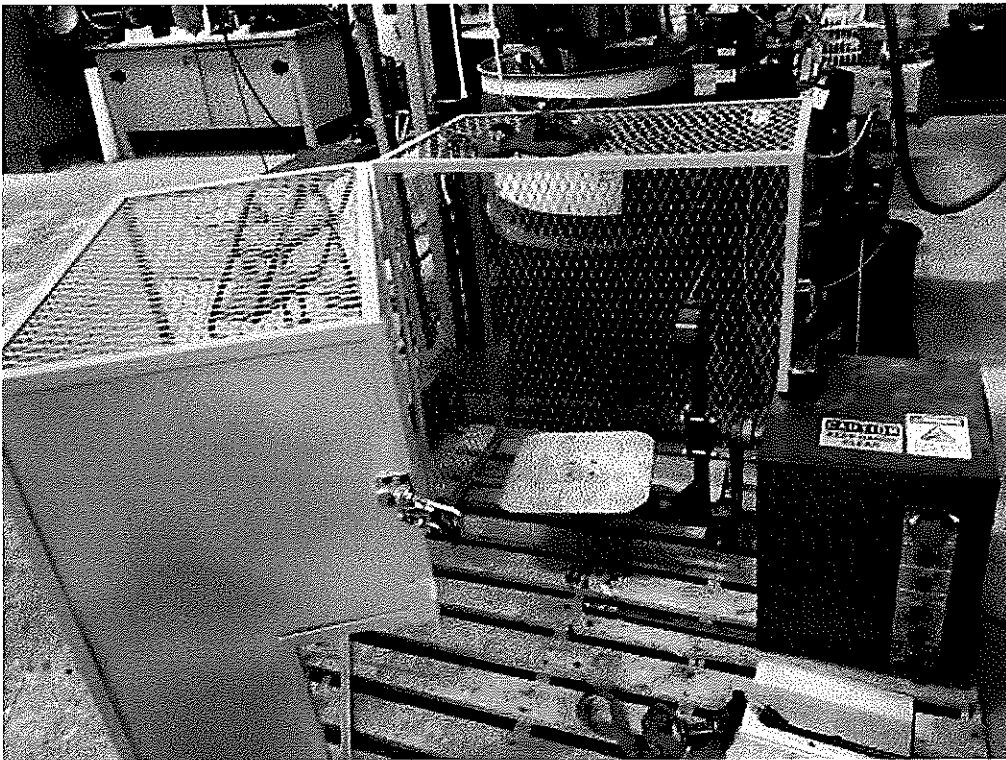


**Image 7(9)** : Large electric oven for heating raw materials, operates at 170 degrees F.





**Image 8(10) :** Testing/lab area



**Image 9(12) :** Rotocaster

NAME Julie L. Brun

DATE 12/19/18

SUPERVISOR J. M.