DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

U47150935737870

FACILITY: Phoenix Polymer Compounding LLC		SRN / ID: U471509357
LOCATION: 7290 Kensington Road, Brighton		DISTRICT: Lansing
CITY: Brighton		COUNTY: LIVINGSTON
CONTACT: Robert Bailey , General Manager		ACTIVITY DATE: 11/30/2016
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Scheduled inspection	to determine compliance with part 201 rules and follow-up	of violation
RESOLVED COMPLAINTS:		

Inspection Report

U471509357- Phoenix Polymer Compounding, LLC 7290 Kensington Rd. Brighton, MI 48116

Inspection Date:

8/27/15

Facility Contacts:

Corey ?, Manager,

Bob Bailey, General Manager, 248-264-1100, rbailey@phoenixpoly.com

MDEQ AQD Personnel:

Nathan Hude - 517-284-6779, huden@michigan.gov

Facility Description:

Phoenix Polymer Compounding LLC is a plastic recycling company that has been in operation since 2007. They accept ground plastic from brokers and grinders in approx. 3/8" chunks or less and combine the plastic with ground tire rubber, talc, and fiberglass as fillers as specified by purchasers. Once mixed, the plastic is then extruded, cooled in a water bath and then pelletized. The pellets are bagged and palletized for transport then sold to plastic injection companies.

The facility is located on the southeast end of an industrial park which is bordered by Island Lake State Recreation Area to the west, north, and east. There are residential areas to the south-south-west and east-south-east within approx. ½ mile.

Applicable Regulations:

Air Pollution Control Rule 336.1285(I)(vi)(B) Plastic cutting exhausted to in-plant environment Air Pollution Control Rule 336.1286(a) Plastic Extrusion

Previous Inspections:

8/27/15, cited VN for oven

Previous Violations:

R336.1201 violation from 8/27/15 inspection sent on 3/18/16

Recent Complaints:

None

Area Complaints:

8/28/14 (C-14-01324) documented a pungent odor from the industrial park area. 10/31/12 (C-13-00154) documented a sour or pungent odor from the industrial park area.

Inspection Key Concerns:

Barnstead Thermolyne oven is used to bake (burn) plastic to ash in order to determine the fill content. Smoke is vented inside the facility yet fugitive emissions are released to the outdoor atmosphere.

Permit Unit Summary Tables

None

Unit Identification

None

MAERS Reporting

None

Inspection Summary

This was a scheduled inspection as part of a follow up to the previous inspection and violation. Area complaints documented pungent odors from the industrial park where Phoenix Polymer is located and neighboring businesses have expressed concern over the odors yet could not provide specific dates.

Extruded plastic is tested onsite and consists of determining the melting point and fill percentage. Fill is determined by baking (burning) the plastic down to ash inside a Barnstead Thermolyne 6000 oven. Up to 10 samples are completed at one time and each sample weighs 15 grams. After the burning is complete, the samples are reweighed to determine fill content. In the past, this is completed approx, two times per day for a total of 300 grams, yet it could be completed more based on demand; a bake/burn cycle takes approx. 1 hour to complete. The smoke from the oven is vented out of the top into the general in-plant environment with fugitive emissions being released to the outdoor ambient air through facility vents. In the previous inspection, this oven was positioned directly under a external vent with a fan that blew the smoke outside; pictures attached to the MACES report identified as CA U47150935733644 show the vent covered in black soot.

Attempts to correct the violation were made by Bob in the manner of moving the oven inside the plant away from the vent and receiving a bid to perform stack testing and determine the emissions of the burn off oven, yet the procedure did not follow state rules to include a notice to the Technical Program Unit for a review of the plan. Bob and I also discussed the installation of an afterburner or to cease the practice and send the samples to a lab for analysis.

I arrived on site at 1:00pm and upon entering the driveway did not notice any odors or VE's; it was a partly sunny day with calm wind. I entered through one of the facilities overhead doors where 2 individuals were speaking. I asked for Bob, but they said he had left for the day and directed me towards Corey who was second in charge. The equipment on the shop floor was not operating.

I found Corey in a nearby office and introduced myself. I informed Corey as to the reasoning of my visit and asked about the oven. Corey pointed out the new location which was in a room adjacent to his office. There was a stack coming off the oven that went through the office drop ceiling. I could not tell where the stack went, but Corey stated that it emitted into the open shop floor. I informed Corey that the previous violation had not been resolved and needed to be corrected. Cory informed me that the business was down to one shift and could possibly close in the near future. I informed him that despite this the violation needed to be resolved and a second violation notice would be sent.

When asked, Cory said that practices had not changed as how the business operated and from looking around, (other than moving the oven) the facility looked as it did in the previous inspection.

Based on the results of the inspection, Phoenix is still in violation of R336.1201 and a violation was sent on 12/9/16.

NAME M. A.L.

DATE 12/9/16 SUPERVISOR