

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Off-site Inspection

N201158300

FACILITY: Belmont Engineered Plastics, LLC		SRN / ID: N2011
LOCATION: 5801 SAFETY DRIVE, NE, BELMONT		DISTRICT: Grand Rapids
CITY: BELMONT		COUNTY: KENT
CONTACT: Ashley Crowell-Cohoon ,		ACTIVITY DATE: 06/07/2021
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 10:00 A.M. on June 7, 2021, Air Quality Division staff Dave Morgan conducted an announced off-site inspection of Belmont Engineered Plastics LLC located at 5801 Safety Drive in Belmont. The purpose of the inspection was to determine the facility's compliance status with state and federal air pollution regulations as well as air use Permit to Install No. 355-05. The off-site inspection was conducted virtually in accordance with AQD Digital Inspection Procedures using Microsoft Teams. Accompanying AQD staff on the inspection was Ashley Crowell-Cohoon, Quality Consultant.

FACILITY DESCRIPTION

Belmont Engineered Plastics manufactures safety equipment including welding hoods, hard hats, safety glasses etc. The facility consists of injection molding, stamping, digital printing and pad printing. The company is currently a synthetic minor source for volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions under PTI No. 355-05.

COMPLIANCE EVALUATION

Many of the VOC and HAP emitting processes originally permitted under PTI No. 355-05 have been removed from the facility. The following is a summary of former and current emission units at the facility and the status of the process:

EQUIPMENT	EXEMPTION	Existing?	COMMENTS
Soldering	Rule 285(i)	No	No Longer at Facility
(3) Pad Printers	Rule 285(l)(ix)	Yes	
(39) Injection Molding Presses	Rule 286(b)	Yes	
(1) Fiberglass Hard Hat Molding Operation	Rule 290	No	Removed in July 2018
(1) Parts Washers each ~ 6 square feet	Rule 281(h)	Yes	No Longer used
Flow Molding	NA	No	No Longer at Facility
Gluing and glue clean-up	NA	No	No Longer at Facility
Painting	NA	No	No Longer at Facility
Cone Mold Release	NA	No	No Longer at Facility
Silkscreen Operations	Rule 287(e)	No	No Longer at Facility
ADF Lens Cleaning	NA	No	No Longer at Facility

Emission/Material Limits and Recordkeeping

The company maintains records to demonstrate compliance with emission and material limits in PTI No. 355-05. The following table is a summary of emission and material usage from May 2020 through April 2021:

<u>Pollutant</u>	<u>Actual</u>	<u>Limit</u>	<u>Compliance</u>
VOC	< 5.6 tons	90.0 tons	Yes
HAPs individual	< 5.6 tons	9.0 tons	Yes
HAPs aggregate	< 5.6 tons	22.5 tons	Yes
Flow Molding		4,727,240 pounds	Not applicable

VOC/HAP emissions from May 2020 through April 2021 are broken down by process as follows:

Ink	0.03 tons
Cleanup	0.68 tons
Mold release	0.03 tons
Plastic injection molding	4.85 tons
Total Emissions	5.6 tons

Because many of the VOC emitting process have been removed from the facility and emissions are so low, it is likely that the facility can be considered a true minor source of VOC and HAP. It is noted that synthetic minor limits for VOC and HAP under PTI No. 355-05 were primarily established because potential emissions from a painting operation at the site exceeded the applicable thresholds. The painting operation has since been removed from the site and therefore facility potential emissions are now likely below the applicable thresholds. In order to void the permit and be considered a true minor source, the company will need to re-evaluate the potential to emit (PTE) for the facility and submit documentation to the AQD for review and approval.

Testing

No testing was required as part of this compliance inspection.

SUMMARY

Belmont Engineered Plastics LLC appears to be in compliance with all applicable requirements. Records obtained during the inspection are attached.


NAME _____

7/20/2021
DATE _____


SUPERVISOR _____