

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

N167065143

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| FACILITY: AGAPE PLASTICS INC | | SRN / ID: N1670 |
| LOCATION: 0-11474 1ST AVENUE, GRAND RAPIDS | | DISTRICT: Grand Rapids |
| CITY: GRAND RAPIDS | | COUNTY: KENT |
| CONTACT: Chris Davis , Quality Manager | | ACTIVITY DATE: 10/26/2022 |
| STAFF: Chris Robinson | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: FY '23 inspection to verify compliance with applicable air quality rules and regulations. | | |
| RESOLVED COMPLAINTS: | | |

A) Introduction

On October 25, 2022, an onsite inspection was conducted at Agape Plastics (Agape, SRN N1670), located at 0-11474 1st Avenue in Grand Rapids, Michigan by Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD). The AQD staff conducting the inspection was Chris Robinson (CR) and the purpose behind the inspection was to determine Agape's compliance status with respect to applicable air quality rules and regulations.

Prior to entering the facility an odor and visible emissions evaluation was conducted with nothing being observed. Upon entering the facility CR met with Chris Davis, Quality Manager; proper identification was presented, and Mr. Davis was informed of the purpose behind the inspection. CR first discussed the expectations of the inspection and reviewed the previous inspection report noting any changes. Mr. Davis then provided a walk-through of the facility which ended with a brief discussion of observations.

B) Facility Description

Agape is a custom plastic injection mold facility that employs approximately 220 staff. They operate 35 plastic mold injection machines with presses ranging from 125 to 1,650-tons. Some of the components that are manufactured are assembled onsite. With the exception of some minor coating by use of an aerosol can, none of the manufactured components are coated or plated. The only adhesive used is a pre-purchased 2-sided tape, therefore no Isopropyl Alcohol or other cleaning solution is required or in use.

C) Regulatory/Compliance Evaluation

All of plastic mold injection units are vented to the in-plant environment. Materials used consist of nylon with some TPO, polypropylene, and vinyl. Only at the beginning of each day do the operators apply mold release by use of aerosol cans. The injection machines and associated process, including use of the mold release, appears to be exempt from Rule 201 permitting requirements per Rule 286(2)(b). Each press station includes a "local" grinder that grinds up any scrap/flashing which is added directly back into the press's feed hopper for immediate re-use. The grinders are not permanently attached and can be operated separately of the press; therefore, they appear to be their own emission unit and exempt from Rule 201 permitting requirements per Rule 285(2)(l)(vi)(B) for grinding of plastic and where emissions are only released to the in-plant environment.

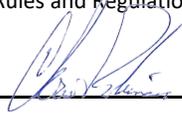
A small bench spray booth is present for coating small plastic components by use of aerosol spray cans. Fugitive emissions from this process are released only to the in-plant environment and once the cans are empty, they are punctured and disposed of. This process appears exempt per Rule 285(2)(hh) for "a process that uses only hand-held aerosol spray cans, including the puncturing and disposing of the spray can".

The maintenance area includes equipment used for cutting, grinding, and welding and a non-heated or agitated cold cleaner. Equipment used for cutting and grinding also appears to be exempt per Rule 285(2)(l)(vi)(B) since emissions associated with the cutting and grinding of metal and/or plastic are only released to the in-plant environment. The portable welders are exempt per Rule 285(2)(i) and the cold cleaner appears exempt per Rule 281(2)(h) since the air to vapor interface is less than 10 square feet. The unit was closed with instructions posted on the inside. Additional instructions were provided and Mr. Davis intends to post those on the outside of the unit as well.

D) Compliance Determination

Based on the observations and discussions made during the inspection Agape appears to be operating in compliance with applicable air quality Rules and Regulations.

NAME


DATE 10/31/2022

SUPERVISOR

