

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

N193524237

FACILITY: SUMMIT POLYMERS, INC - SYNTECH PLANT		SRN / ID: N1935
LOCATION: 1211 PROGRESS ST, STURGIS		DISTRICT: Kalamazoo
CITY: STURGIS		COUNTY: SAINT JOSEPH
CONTACT: Pamela Mayer , Human Resources Manager		ACTIVITY DATE: 02/03/2014
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. The inspection brochure was handed out. Ms. Pamela Mayer is the contact person.

This facility makes plastic parts. This is done by injection molding. The parts are then painted.

There are 4 spray booths at the facility. These are labeled EU BOOTH 6 (solvent-based coatings), EU BOOTH 5 (water-based coatings), EU Booth 2 (solvent-based coatings), and EU BTH1-1K (water-based coatings). These are robotic booths. They are enclosed. The booths automatically shut off at a differential pressure set point. Otherwise the filters are changed at the end of a shift as needed. Booth 1 has a mask washer for the cleaning of water-based spray equipment. It uses a product called Galaxy. Acetone is used for cleaning the solvent-based booths.

There are 21 injection molding machines. Plastic is received as pellets in boxes. It is pneumatically conveyed to the machines. Polypropylene, ABS, and nylon are some of the plastics used. In 2012, 2,246,235 pounds of plastic was used.

There are some pad printing machines for the plastic parts. Summit polymers staff said that about 1 gallon per year may be used in the pad printers.

There is a paint room. Here all solvents and coatings are checked out. Once checked out they go onto the monthly record keeping sheets. Partial containers are not checked back in but remain at the booths until used. There is a 5 gallon distiller here to reclaim solvent. Reclaimed solvent is not credited in with the record keeping.

There is one parts cleaner. The lid was closed and the rules were posted.

The four spray booths are covered by General Permit to Install 37-07. The facility is also covered by opt-out permit 362-00 for HAPs. The coating and solvent usage and VOC emissions are tracked each month for each spray booth. There is a separate sheet for VOC pounds per month and 12-month rolling time period. Another spread sheet calculates HAPs. For 2013 the 12-month aggregate HAPs was 0.647 tons.

Some SDS's were checked and compared to the values on the record keeping sheets. It was noticed that there was column called water/exempt. It was explained by Summit Polymer staff that water and exempt solvents are subtracted from the VOC amount. Upon further investigation it was found that the gallons of coating was multiplied by the coating VOC on the SDS (less water and exempt solvents) and this product (1) was being multiplied by the percentage of water by weight in the coating. This latter number was being subtracted from (1) calculated above to get the total VOC number.

AQD staff asked for some SDS's and the % water information and said this material would be taken back to the office. The % water information was emailed later. AQD staff noticed that some SDS's had a coating VOC minus water and exempt solvents number and a material VOC number, both in pounds per gallon. It was determined that the material VOC number should be multiplied by the gallons of coating used to get the total VOC. It was not known if the method that Summit Polymers was using was incorrect, but it did not match the "DEQ Coating Fact Sheet".

AQD staff called Summit Polymers and arranged a meeting. During the meeting Summit polymers agreed to re-calculate total VOC based on material VOC. Summit Polymers revised the recordkeeping sheets using only the "material VOC". According to this sheet Summit Polymers was in compliance for 2013.

NAME Dennis Dunlap

DATE 2/24/14

SUPERVISOR MA 2/24/2014