

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

N214652637

|                                                                                                                                                         |                               |                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------|
| FACILITY: West Michigan Molding, Inc.                                                                                                                   |                               | SRN / ID: N2146           |
| LOCATION: 1425 AERIAL VIEW DR, GRAND HAVEN                                                                                                              |                               | DISTRICT: Grand Rapids    |
| CITY: GRAND HAVEN                                                                                                                                       |                               | COUNTY: OTTAWA            |
| CONTACT: Kris Wagenmaker, Director of Production Manufacturing                                                                                          |                               | ACTIVITY DATE: 03/02/2020 |
| STAFF: Chris Robinson                                                                                                                                   | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: FY '20 on-site inspection to determine the facility's compliance status with PTI No. 213-00E and applicable air quality rules and regulations. |                               |                           |
| RESOLVED COMPLAINTS:                                                                                                                                    |                               |                           |

AQD Staff Chris Robinson (CR) conducted a scheduled unannounced inspection of West Michigan Molding (SRN N2146) located at 1425 Aerial View Drive in Ottawa County, Grand Haven, Michigan on March 2, 2020. CR met with both Chris Wagenmaker, Director of Product Manufacturing and Terry Carlson, Director of Plant Operations. The intent of the visit was relayed along with identification. Prior to entering the facility, the perimeter of the building was surveyed for odors and visible emissions. None were observed.

**Facility Description**

West Michigan Molding (WMM) is an automobile plastic parts manufacturer. Processes equipment includes one (1) sonic plastic welder, 57 plastic injection mold machines and six (6) spray booths and one (1) natural gas fire curing oven. All six (6) spray booths are connected to the curing oven.

**Compliance Evaluation**

Per discussions with Ms. Wagenmaker and Mr. Carlson, there have been no changes since the last inspection which was conducted on December 3, 2015. The plastic injection mold machines and associated equipment are being operated under Rule 201 Permit to Install (PTI) exemption Rule 286(2)(b) for "plastic injection, rotocasting and pultrusion equipment and associated plastic resin handling, storage, and drying equipment". The sonic welder is being operated under Rule 201 PTI exemption Rule 286(2)(f) for "Plastic Welding". The six spray booths are covered under PTI No. 213-00E. Compliance with the PTI conditions is discussed below.

**FGSPRAYBOOTHS**

The six (6) dry filter spray booths (EUSPRAYBOOTH1 and EUSPRAYBOOTH3 through EUSPRAYBOOTH7) are subject to the following emission limits:

| Pollutant                         | Limit       | Time Period      | Calculated Emissions                                                                            |
|-----------------------------------|-------------|------------------|-------------------------------------------------------------------------------------------------|
| VOCs                              | 22.0 tpy    | 12-month rolling | *2.79 tons in February 2020 with a highest monthly total of 0.48 tons reported for August 2019. |
| Tripropylene Glycol               | 4.8 tpy     |                  | * 0.00 tons                                                                                     |
| Naphthalene                       | 1.4 lb/day  | Calendar Day     | **0.57 lbs. max (March 3, 2020)                                                                 |
| p-Chlorobenzotrifluoride          | 33.6 lb/day |                  | **0.57 lbs. max (March 3, 2020)                                                                 |
| Diethylene Glycol Monobutyl Ether | 9.6 lb/day  |                  | **0.00 lbs.                                                                                     |

\* 12-month rolling total based on records provided for March 2019 through February 2020.

\*\* pounds based on March 2020 records

The spray booths are equipped with HVLP spray applicators as required in FGSPRAYBOOTHS Special Condition (SC) IV.2. Exhaust filters were installed, maintained, and operated as required by SC IV.1. Per Mr. Carlson the filters are changed out once per shift.

The facility is required to maintain daily and monthly records for FGSPRAYBOOTH. Records were prepared in a timely manner as required per FGSPRAYBOOTH SC VI.1 and complete as specified in FGSPRAYBOOTH SC VI.3.a-d, VI.3.4.a-d, and VI.5.a-c. Daily records for March 2020 were provided along with January 2019 through February Monthly and annual records which are all attached and summarized in the table above. Based on these

records WMM is operating with emissions well under the limits specified in their permit.

The stack height and diameter requirements in FGSPRAYBOOTH SC VII.1-8 were not explicitly verified but the stacks were visually observed and appeared to meet these requirements. In addition, Ms. Wagenmaker and Mr. Carlson indicated that there have been no changes to the stacks since the last inspection.

FGSPRAYBOOTH SC III.1 requires all waste to be captured and stored in closed containers and disposed of in an acceptable manner. Per observations and discussions, all waste material is being stored in closed containers which is eventually collected and disposed of by liquid industrial waste.

**FGFACILITY**

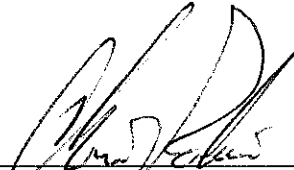
Permit to Install No. 213-00E is the facility's Title V opt out permit which includes facility-wide emission limitations that keep the facility's Potential to Emit below the Title V thresholds for VOCs (100tpy), Individual HAPs (10tpy) and aggregate HAPs (25tpy). The following emission limits apply:

| Pollutant           | Limit              | Time Period      | Equipment                                                                   | Calculated Emissions based on records provided for March 2019 through February 2020             |
|---------------------|--------------------|------------------|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Each Individual HAP | 9.0 tpy            | 12-month rolling | FGFACILITY                                                                  | 0.07 tons (MIBK)                                                                                |
| Aggregate HAPs      | Less than 22.5 tpy |                  |                                                                             | 0.18 tons                                                                                       |
| VOC                 | Less than 30.0 tpy |                  | All Plastic parts coating lines exempted per R336.1632(15)(i) in FGFACILITY | 2.79 tons in February 2020 with a highest monthly total of 0.48 tons reported for August 2019.  |
| Cumene              | 0.4 tpy            |                  | FGFACILITY                                                                  | 0.01 tons in February 2020 with a highest monthly total of 4.6 pounds reported for March 2019.  |
| Naphthalene         | 0.4 tpy            |                  |                                                                             | 0.02 tons in February 2020 with a highest monthly total of 7.4 pounds reported for August 2019. |

The facility is required to maintain daily and monthly records for FGSPRAYBOOTH. Records were prepared in a timely manner as required per FGFACILITY SC VI.1 and complete as specified in FGFACILITY SC VI.3.a-e, VI.3.4.a-e, and VI.5.a-d. Daily records for March were provided and are attached. Monthly and annual records were also provided and are attached. Based on these records, which are summarized above, facility wide emissions appear to be below limits specified in the facility's PTI.

**Compliance Determination**

Based on the observations made at the time of this inspection and a subsequent record review West Michigan Molding appears to be in compliance with applicable air quality rules and regulations including the requirements specified in PTI No 213-00E.

NAME 

DATE 4/2/2020

SUPERVISOR 