

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

N697633064

FACILITY: HUNTINGTON FOAM LLC		SRN / ID: N6976
LOCATION: 1323 MOORE DRIVE, GREENVILLE		DISTRICT: Grand Rapids
CITY: GREENVILLE		COUNTY: MONTCALM
CONTACT: Thomas Winks , Plant Manager		ACTIVITY DATE: 01/22/2016
STAFF: Steve Lachance	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection for FY '016		
RESOLVED COMPLAINTS:		

SLachance of AQD conducted an unannounced inspection of Huntington Foam LLC on Friday, January 22, 2016. The purpose of the inspection was to verify compliance status of the facility with respect to Opt-Out Permit to Install (PTI) No. 156-01C and applicable air use requirements.

The facility produces expanded polystyrene foam packaging materials. Two natural gas-fired boilers provide steam to expand polystyrene beads with known pentane content; this heating expands and fluidizes the polystyrene for subsequent molding. The expansion and molding operations are accounted for in EU02000 in PTI No. 156-01C:

EU02000 "Expandable polystyrene foam molding line consisting of two pre-expanders (a primary and a back-up), mold machines, and raw material, intermediate product, and final product storage."

The facility is a Synthetic Minor source for VOCs (through material limits established in PTI No. 156-01C) and is a true minor source of other pollutants. The two boilers are subject to New Source Performance Standards (NSPS) and so the facility is categorized as Category II Fee-subject. The facility reports emissions through MAERS each year.

As SLachance approached the facility at about 9:45 AM, 1/22/16, no odors or visible emissions were noted. (SL did observe periodic steam release, as expected from such an operation.) Weather conditions were very quiet and about 25 degrees F, with overcast skies and light snow.

SLachance presented himself at the front desk and asked for previous AQD contacts Mr. Tom Winks or Mr. Bob Staffo; and learned that Mr. Staffo no longer works at the facility (SLachance subsequently removed him from MACES as a facility contact), and Mr. Winks was currently the plant manager, but was out-of-state this day. SLachance further explained the purpose of his visit; and learned that Ms. Shannon DeBoer, HR Administrator and currently at the front desk, could assist with the inspection. SLachance shared the DEQ's "Environmental Inspections: Rights and Responsibilities" brochure and continued with the inspection. Ms. DeBoer was able to provide all requested records and provided access to the facility; and was able to answer all questions during the inspection, in some cases seeking assistance from facility personnel.

Emission Limits and Monitoring/Recordkeeping; PTI No. 156-01C establishes emission limits of 490 pounds per day VOC; and 85 tons per year, based on a 12-month rolling time period as determined at the end of each month. Compliance demonstration is based on required records for VOC content of materials used (expandable polystyrene resin) each day; pounds of each resin used each day; mass balance calculation of daily VOC emissions (which is defined in the permit's appendix as allowing for 15% retention of VOC in final product); and monthly and 12-month rolling VOC emissions.

Required records were readily available, current and complete. Example Daily Records and 12-month rolling records are attached. SLachance and Ms. DeBoer examined and discussed the content and structure of these records, which were found to be satisfactory. SLachance further requested manufacturer's "Certificates of Analysis" for specific lots of polystyrene resins, and these too were readily available. Current records were consistent with (or in one case, overstate) the VOC contents of the materials per these certificates of analyses. Note, the AQD had previously approved the use of these certificates as the basis for documenting VOC contents of materials.

Records establish 12-month rolling emissions at about 30-35 tpy VOC with some variation based on

business activity.

SLachance and Ms. DeBoer reviewed Daily Records for the period January 2015 through 1/21/16; and SLachance identified three dates (most recent being 1/4/16) in which the records indicate VOC emissions in excess of 490 pounds. (Emissions on 1/4/16 are presented as 588 pounds.) This appears to be a violation of Special Condition I.1. of PTI No. 156-01C, which limits VOC emissions to 490 pounds per day.

Material Limits are complied with per the established records and as established through the weighted average, 12-month rolling VOC emissions (VOC emissions are less than 85 tons per 12-month rolling time period); Testing/Sampling provisions have not been triggered per the facility's approved use of 15% retention of VOC in the final product and use of Certificates of Analyses for each material lot; and Stack Dimensions looked to be consistent with required height and dimension requirements.

During the facility walk-through, SLachance observed that "EU02000" is present in the facility as described in the permit. There are eight (8) molding machines per this permit; the previously-permitted machine(s) have been removed from the facility.

An internally venting, exempt (per Rule 285(l)(vi)(B)) foam grinding/reclaim machine was observed; this area was clean.

SLachance observed each boiler and confirmed:

- natural gas usage only;
- installed/constructed in 1998/1999;
- maximum heat input on natural gas is just over 20 mmBtu/hr (Boiler 1) and 16 mmBtu/hr (Boiler 2);
- exempt per Rule 282(b)(i)

As an Area Source of HAPs, these natural gas-fired boilers are not regulated by the Area Source Boiler MACT, 40 CFR 63 Subpart JJJJJJ.

SUMMARY and CONCLUSION

As discussed with Ms. DeBoer prior to leaving the facility, on-site equipment, operations and records indicate compliance with applicable air use requirements with the exception of three specific operating days for which VOC emissions exceeded the daily limit of 490 pounds per day.

SLachance recommends issuance of a Violation Notice for noted exceedances of the limit, with an underlying applicable requirement of Rule 225.

ATTACHMENTS:

- Daily Record Example (January 2016 through 1/22/16)
- Monthly/12-Month Rolling Example (Current through December 2015)
- Two Requested Certificates of Analyses (Specific to Product and Lot)

NAME



DATE

1/25/16

SUPERVISOR

