

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

P137367399

FACILITY: PORTERCORP		SRN / ID: P1373
LOCATION: 4240 NORTH 136TH AVENUE, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Randy Bakker , Maintenance Supervisor		ACTIVITY DATE: 04/18/2023
STAFF: Chris Robinson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: FY '23 Inspection to determine compliance with applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

This report documents the April 18, 2023, onsite inspection conducted at Porter Corporation (SRN P1373) by Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff Chris Robinson (CR). The purpose of this inspection was to assess this facility's compliance status with respect to all applicable air quality rules and regulations.

Porter Corp is located in Ottawa County at 4240 136th Avenue, Holland, Michigan. Weather conditions were cloudy with a temperature of approximately 37 degrees Fahrenheit and west-northwest winds (www.weatherunderground.com). Prior to entry CR surveyed the perimeter of the facility for odors and visible emissions, none were observed. CR then entered and met with Mitch Harsevoort, Director of Manufacturing and informed him of the purpose of the visit. CR later spoke with Randy Bakker, Maintenance Supervisor, and Lee Hodge.

This facility manufactures structural insulated panels and tubular bolt together steel canopy frames. The insulated structural panels consist of prepurchased Styrofoam that is adhered to sheet wood. A roll coater is used to apply the adhesive. The facility has two roll coaters with the newest one being installed in 2012. The previous 2007 AQD inspection determined the older roll coater to be grandfathered from Michigan's air quality rules and regulations because it was installed prior to August of 1967. Although this roll coater is still installed it is only used as a backup which has not been required yet. On May 9th CR had a Team's meeting with Mr. Harsevoort, Mr. Bakker, and Mr. Lee to discuss permitting and exemption requirements for the new roll coater. CR informed the group that Rule 201 of Michigan's Air Pollution Control Rules prohibits the construction of an emission unit/process unless it is permitted or exempt. Rule 201 permitting exemption Rule 287(2) (c) was discussed for the newer roll coater. Since usage is greater than the 200 gallons per month limit (approximately 530 gallons) and the adhesive does not contain water, Rule 287(2)(c) would not be appropriate. Exemptions Rule 290 and Rule 291 may be appropriate and were discussed but the facility decided to permit the roll coater instead. CR informed the facility that installation without an appropriate exemption or Permit to Install (PTI) is a Rule 201 violation and that a Violation Notice would be issued. CR was informed by the facility on May 11, 2023, that a Permit to Install (PTI) application was mailed to AQD's Permits Section that day.

Once the Styrofoam is adhered to the sheet wood, various saws are used to cut the product to final shape and size. Sawdust and Styrofoam pieces are collected by a baghouse. Since the system was not operating at the time of this inspection, differential pressures were not available, however Mr. Harsevoort indicated that preventative maintenance is conducted frequently. The baghouse did appear to be well maintained but there was a minor amount of waste material on the ground near the baghouse and the enclosed dumpsters attached to the baghouse. CR informed Mr. Harsevoort that any waste collected MUST remain in the dumpster at all times and requested that the area be

cleaned up. The cutting equipment appears to be exempt from Michigan's Rule 201 permitting requirements per Rule 285(2)(i)(vi)(B&C), depending on whether or not the baghouse is vented internally or externally.

Tube steel used for the frame structures is pre-purchased then cut and welded to proper

dimensions. Once completed the components are cleaned by shot blast then powder coated. Welding is conducted indoors only and does not currently utilize any particulate control. However, Mr. Harsevoort indicated that the facility will be adding filtration in the near future. Welding appears exempt from Rule 201 permitting requirements per Rule 285(2)(i). Shot blasting is controlled by use of a baghouse which is vented externally. The building's facial material is steel

which was coated in rust on the same side as the baghouse exhaust vent. Per Mr. Harsevoort they have had issues with baghouse fallout being deposited on both the siding and ground which rusts causing the rusty appearance. Per Mr. Harsevoort this was an old issue resolved by adjusting their preventative maintenance, examples of what is currently being done are included. CR did not observe any current opacity or fallout issues, so it appears as though the facility's corrective action was successful. CR informed Mr. Harsevoort that Rule 370 requires collected air contaminants to be disposed of in a manner that minimizes its introduction to the outer air. The shot blasting equipment appears to be exempt per Rule 285(1)(vi)(C), as long as the facility maintains proper control. This exemption requires a mechanical precleaner and per Mr. Bakker the baghouse is equipped with a separator that removes fine material.

Once cleaned the steel is powder coated manually or robotically, depending on color. The process includes the usual phosphate wash tanks to prepare the metal and the spraying area is equipped with particulate filter cartridges which looked to be well maintained. This equipment appears to be exempt per Rule 287(d).

The facility also utilizes a cold cleaner which appears exempt per Rule 281(2)(h) since the air/vapor interface is less than 10 square feet. Upon inspection the unit was closed. Instructions were provided.

Porter Corporation is not operating in compliance with applicable air quality rules and regulations, specifically with Rule 201 for installing the new roll coater without a PTI or PTI exemption. A violation notice will be issued.

NAME

DATE 5/15/2023

SUPERVISOR