

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

U70181035947076

FACILITY: Shape Corporation		SRN / ID: U701810359
LOCATION: 16344 Comstock, Grand Haven		DISTRICT: Grand Rapids
CITY: Grand Haven		COUNTY: OTTAWA
CONTACT: Michael Westbrook , Safety & Environmental Manager		ACTIVITY DATE: 10/26/2018
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2019 unannounced inspection.		
RESOLVED COMPLAINTS:		

Clean Air Act Inspection report for Shape Corporation, (Shape) Grand Haven, Michigan

Regulatory authority

Under the Authority of Section 5526 of Part 55 of NREPA, The Department of Environmental Quality may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Background

Shape Corporation is a manufacturer of automotive parts. The facility specializes in the manufacturing of bumpers and energy management systems (brackets). The main processes at this facility include plastic injection, molding and assembly/value added.

Shape Corporation's facility is a minor source of air contaminants and is not subject to the Title V program.

Compliance History

The facility has not received any violation notices in the past five years.

Location

Shape Corporation has a facility located at 16344 Comstock, Grand Haven, Michigan. This area is a light industrial area with residential properties to the north and east. The facility is located on the northern border of an airport. The nearest residential structure is approximately 200 feet to the east of the facility. The Comstock facility is also located in close proximity to Shape Corp's 172nd Ave and Hayes Street facilities. The facilities were inspected on the same day as the Hayes Street campus. The inspections are recorded in separate inspection reports. The EPA is currently reviewing the policy on single source determinations and Shape Corporation should reevaluate if the associated buildings are a single source, or if they are separate prior to installation of new emission units.

Introduction and purpose of inspection

On October 26, 2018 Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced, scheduled inspection of Shape Corporation. The MDEQ inspected the facility campus located at 16344 Comstock Ave, Grand

Haven, Michigan.

The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules.

Observations and facility processes

AQD staff met with Michael Westbrook, Safety and Environmental Manager, presented their identification and informed the representative of the intent of the inspection. The facility representative agreed to show the AQD the facility and its processes. The facility's processes are described in some detail below.

The facility's main process is plastic injection molding. The facility has approximately 10 large injection molds. The molds are capable of producing relatively large plastic components for the automotive industry. Once the parts are molded, workers clipped off excess plastic and moved the parts to further processing. Some of the parts received additional components added. I observed one station where an adhesion promotor was used to apply a foam tape. Other areas used pins or clips to add components.

Regulatory analysis and compliance evaluation

Exempt processes

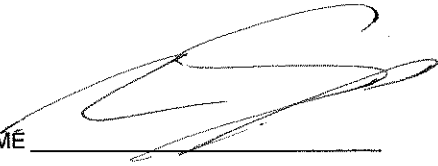
The primary activity of plastic injection molding does not appear to require a permit as defined by Rule 201. The process appears to meet the exemption from requiring a permit pursuant to R 336.1286(2)(b) which in part states ... (2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following: ... (b) Plastic injection, compression, and transfer molding equipment and associated plastic resin handling, storage, and drying equipment....

The value added component that emits air contaminants from the adhesion promotor appears to meet the exemption R 336.1287(2)(a) which in part states ... R 336.1287 Permit to install exemptions; surface coating equipment. Rule 287 ... (2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following: (a) An adhesive coating line which has an application rate of less than 2 gallons per day and which has emissions that are released only into the general in-plant environment.

In order to comply with the above exemption Shape should track and record daily coating usage for each applicable emission unit. If the facility projects to exceed the limit as defined by the exemption they should address whether a permit would be required.

Discussion

Compliance statement: It appears that Shape Corporation is in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules..

NAME 

DATE 12/26/18

SUPERVISOR 