

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

N560173950

<b>FACILITY:</b> COMCAST URETHANE		<b>SRN / ID:</b> N5601
<b>LOCATION:</b> 425 LEGGITT ST, MARSHALL		<b>DISTRICT:</b> Kalamazoo
<b>CITY:</b> MARSHALL		<b>COUNTY:</b> CALHOUN
<b>CONTACT:</b> Mark Warner , Operations Manager		<b>ACTIVITY DATE:</b> 08/15/2024
<b>STAFF:</b> Jared Edgerton	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Unannounced Air Quality Inspection		
<b>RESOLVED COMPLAINTS:</b>		

**On August 15, 2024, Air Quality Division (AQD) staff (Jared Edgerton) arrived at 425 Leggitt Street, Marshall Michigan at 12:45 PM to conduct an unannounced air quality inspection of Comcast Urethane Corporation. The purpose of the inspection was to determine the facility's compliance with exemption Rules 290 and 287. The facility once held Permit No. 467-95A, but it was voided in 2000. The last time the facility was inspected was February 29, 2012, and it was deemed compliant with exemption requirements.**

**Comcast Urethane is a small facility that has been in operation since 1982, with about 19 total employees. The facility runs on one 10-hour shift Monday through Thursday, 6:00 AM to 4:30 PM. Comcast produces various forklift parts and uses polyurethane molding machines in order to shape the products into the desired form. The facility has two high pressure molding stations. One of the molding stations is rated for 60 pounds per minute capacity, and the other is rated for 40 pounds per minute. There are also six low pressure molding stations that operate similarly to the high-pressure stations, just for smaller plastic parts, and at a smaller scale. Both of these operations use Rule 290 to be exempt from permitting. Spray painting is also performed at the low-pressure stations, and coating usage at the time of the last inspection was below the 200 pounds per month limit in Rule 287. The coating activities are considered exempt under Rule 287(2)(c). The facility used to clean the production machines in the high pressure molding stations with methylene chloride, and qualified with the 20 pounds per month limit for carcinogenic compounds.**

**Staff met with Jake Burnham, Operation Manager. He answered all operational questions and escorted staff for the inspection tour. Mark Warner, who was the previous contact, is now the General Manager of Comcast Urethane. Summarized below are the results of the on-site inspection and review of records.**

#### **Inspection Walkthrough:**

**Upon arrival, there were no noticeable odors or visible emissions coming from the facility. The tour started with walking through the central room of the building. This space is used as a storage warehouse for finished products, spare machine parts, and other tools used in operation activities. On the back side of the storage room is an adjacent room which houses the two high pressure molding stations. During the inspection, both stations were active and appeared to be producing plastic backing for the backrests on the forklifts. One machine is rated at 60 pounds per minute capacity and the other is rated for 40 pounds per minute. Mr. Burnham told AQD staff that pentane was still being used as a blowing agent. In the past, the blowing agent was added to a liquid isocyanate mixture to form a foam part for the seat. Staff did not confirm if this product was being produced at the time of the inspection. Mr.**

Burnham showed staff where the pentane is monitored with alarms in place in case something went wrong with the enclosed system. Each station had fume hoods that exhaust to the ambient air outside the building.

Staff then walked back into the storage area to the low-pressure molding machine room. In this room smaller products were being assembled. Mr. Burnham stated that coating activities had decreased significantly since the last inspection and are very dependent on each customer order. There was just one pressure molding station that was coating parts with a blue paint. It was stated that this part was ending its production life and will no longer require coating in the near future. AQD staff asked if methylene chloride was still being used at the facility. It was noted that it is rarely used, and Mr. Burnham stated that it is used to flush filters once or twice a year at most.

Mr. Burnham also stated that the facility had some additions to the company. On the back of the building behind the high-pressure molding station room was another warehouse room. This room was added about two to three years ago. It was confirmed by staff that this was used similarly to how the central storage room was used. No manufacturing occurs in this room. The inspection moved outside to the other addition. On the back of the property is a new barn that was constructed last year. Mr. Burnham told staff that this barn is going to be used to store various tools and old molds that go out of service for longer than a year. The barn appeared to be just a storage area, and no additional manufacturing operations were being conducted.

The inspection concluded with a walk around the building. No visible emissions or odors were observed. Mr. Burnham stated that Mark Warner would have all the records required by the exemption rules available for staff. AQD staff thanked Mr. Burnham for his cooperation during the inspection tour, and informed him that a records request email would be sent to Mr. Warner. Records were received by staff in the time allowed, and the result of the records review is summarized below:

#### **Conclusion of Inspection / Records Review Compliance Determination:**

At the time of the inspection, based on what was observed during the walkthrough, emission units appeared to be compliant with emission and material limits listed under exemption Rules 290(2)(a)(i), 290(2)(a)(ii)(B) and 287(2)(c). There are recordkeeping requirements for both Rules 290 and 287. Records were received for the last two years.

**Rule 290(2)(a)(i): records for the two high pressure molding stations and six low pressure molding stations.**

#### **Exemption Condition:**

1. Please provide records of material used and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate that the emissions meet the emission limits outlined in this rule. Volatile organic compound emissions shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the department. Provide records for both processes.
  - Appears compliant? – Yes. Records were acceptable and satisfactory with the requirement. Records list each material and show the amount of VOC emitted each month. The facility has a limit of 1000 pounds per month for the use of Pentane. In 2024, the highest month was June with 127.6 pounds. In 2023, 160.3 pounds were

emitted in November. These months are well below the limit and show compliance with this exemption

### **Rule 287(2)(c) records for all paint operations at Comcast Urethane:**

1. Please provide coating usage records per month.
  - Appears compliant? – Yes. Records were acceptable and satisfactory with the requirements. The facility has a 200 pounds per month usage limit. The facility reported in 2024 that January had the most usage with 5.9 pounds. In 2023, October was reported to have used 10.6 pounds. These totals are well below the limit.

### **Rule 290(2)(a)(ii)(B) for Methylene Chloride cleaning operations:**

1. Please provide records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate that the emissions meet the emission limits outlined in this rule. Volatile organic compound emissions shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the department.
  - Appears compliant? – Yes. Records were acceptable and satisfactory with the carcinogenic compound requirements under Rule 290(2)(a)(ii)(B). The facility has an emission limit of 20 pounds per month for any uncontrolled carcinogenic compound. The facility recorded that in the last two years, only 5.6 pounds have been emitted. This is well below the limit.

**After reviewing what was observed during the on-site inspection and determining that the records were satisfactory with exemption requirements, it appears that the molding stations qualified for the Rule 290(2)(a)(i) exemption, painting qualified for the Rule 287(2)(c) exemption, and that the methylene chloride cleaning practices are exempt under Rule 290(2)(a)(ii)(B). The facility appears to be in compliance with these exemptions. Staff concluded the inspection at 1:15 PM. -JLE**

NAME J. Edgerton

DATE 9-30-24

SUPERVISOR Monica Brothers