DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

A644538746

FACILITY: TRELLEBORG AUTOMOTIVE USA, INC.		SRN / ID: A6445
LOCATION: 180 DAWSON ST, SANDUSKY		DISTRICT: Saginaw Bay
CITY: SANDUSKY		COUNTY: SANILAC
CONTACT: Deb Sopczynski , HR Manager		ACTIVITY DATE: 02/23/2017
STAFF: Sydney Bruestle	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite inspection to determine compliance with PTI 145-07B and all other applicable state and federal air quality regulations		
RESOLVED COMPLAINTS:		

On February 23, 2017 I (Sydney Bruestle) performed an onsite inspection of Trelleborg (Vibracoustics) Automotive located at 180 Dawson St Sandusky Ml. Trelleborg Automotive currently holds one Permit to Install (PTI 145-07B) with the Michigan Department of Environmental Quality, Air Quality Division. PTI 145-07B is an opt out permit for HAPs and VOCs. While onsite I met with Deb Sopczynski. Ms. Sopczynski gave me a tour of the facility and presented me with the emission records required by PTI 145-07B.

Facility Description:

Trelleborg Automotive specializes in bonding rubber to metal as an anti vibration mechanism for auto parts. The facility currently operates 46 injection molding presses. Rubber particles are melted down in the presses and pushed into a mold to create a wide variety of parts. The facility employs around 300 employees and operates 24/7 365 days a year. Trelleborg Automotive recently submitted a permit to install modification application to add 10 more presses and remove two older rotary presses.

Emission Units/Emission Records:

EUINJECTIONMOLD

The Facility is permitted for 50 injection molding presses. There is no pollution control. Records of mold release usage (in gallons), VOC content (with water) for each mold release agent, and VOC mass emission calculations are all being maintained. Records of solvent based marking inks (in gallons), VOC and acetone content of each coating and reducer, and VOC and acetone mass emission calculations (combined in tpy) are all being maintained.

VOC Limit: 9.1 tpy (12 month rolling time period)

The 12 month rolling time period emission rate was 2.1 tpy in January of 2017. This is well below the emission limit.

VOC and Acetone combined limit: 1.0 tpy (12 month rolling time period)- for the use of marking inks only

The 12 month rolling time period emission rate was 0.013 tpy in January of 2017 (for marking inks).

EUAIRSTRIPPER

The facility operates an air stripper to remediate contaminated ground water. This is part of consent decree with the water resources division. The air stripper contains activated carbon control.

VOC limit: 1.9 tpy (12 month rolling time period):

The 12 month rolling time period emission rate was approximately 0.005 tpy in January 2017. Through sampling of influent and effluent streams the carbon control has shown to be 95% efficient.

VOC limit: 0.44 lb/hr:

January 2017 testing: 0.00104 lbs/hr

Trichloroethylene (TCE) limit: 0.23 lbs/hr

January 2017 testing: 0.00063 lbs/hr

1,1- dichloroethene limit: 0.003 lbs/hr

January 2017 testing: 0.00000 lbs/hr

The facility is monitoring and recording the flow rate and total VOC concentration of the influent and effluent water streams of the air stripper on a monthly basis.

EUSOIL

The facility operates a soil vapor extraction process using steam regeneration activated carbon.

VOC Emission Limit: 2.5 tpy (12 month rolling time period):

The 12 month rolling time period emission rate was approximately 0.04 tpy in January 2017. Through sampling of influent and effluent streams the carbon control has shown to be 95% efficient.

VOC emission limit: 0.57 lbs/hr:

January 2017 Testing: 0.00009 lbs/hr

Trichloroethylene emission limit: 0.12 lbs/hr:

January 2017 Testing: 0.00006 lbs/hr

1,1-Dichloroethene emission limit: 0.001 lbs/hr:

January 2017 Testing: 0.00000 lbs/hr

The facility is monitoring and recording the flow rate and total VOC concentration of the influent stream on a monthly basis and the effluent stream on a quarterly basis.

FGROTARYMACHINES

Rotary Polyurethane injection molding machines. No Control Device.

VOC emission limit: 36.0 tpy (12 month rolling time period):

The 12 month rolling time period VOC emission rate was 13.8 tpy in January 2017.

EUDESMA and EUGUSBI32 are being removed from the facility.

FG FACILITY

Individual HAP emission limit: Less than 10 tpy (12 month rolling time period):

The highest 12 month rolling time period individual HAP emission rate was 0.32 tpy for January 2017. This value is consistent with past records reviewed onsite.

Aggregate HAP emission limit: Less than 25 tpy (12 month rolling time period):

The 12 month rolling time period aggregate HAP emission rate was 0.96 tpy in January 2017. This value is well below the limit and is consistent with past records reviewed onsite.

VOC emission limit: Less than 90 tpy (12 month rolling time period):

The 12 month rolling time period VOC emission rate was 16.7 tpy for January 2017. This value is well below the facility wide limit and is consistent with past records reviewed onsite.

**Records supporting the above information are attached to the file copy of this report.

At the time of this inspection it appeared Trelleborg Automotive was in compliance with PTI 145-07B and all other applicable state and federal air pollution control regulations.

NAME SUST DATE

DATE 03/02/17

SUPERVISOR___

C. Mare