

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

B198862542

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|--|--------------------------------------|----------------------------------|
| FACILITY: Lear Corporation | | SRN / ID: B1988 |
| LOCATION: 10161 N Roscommon Rd, ROSCOMMON | | DISTRICT: Gaylord |
| CITY: ROSCOMMON | | COUNTY: ROSCOMMON |
| CONTACT: | | ACTIVITY DATE: 01/22/2022 |
| STAFF: Sharon LeBlanc | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Scheduled site inspection and records review for a minor source. May be an exempt process. sgl | | |
| RESOLVED COMPLAINTS: | | |

On January 27, 2022, AQD District Staff conducted a scheduled site inspection of the Lear Corporation Roscommon plant (B1988) located at 10161 N. Roscommon Road, Roscommon, Roscommon County, Michigan. The referenced facility manufactures seating components, and presently operates a coating line(s) under General Permit No. 53-10. The referenced site inspection was conducted with the intent of determining compliance with the referenced General Permit.

The most recent site inspection was conducted on August 19, 2010. No compliance issues were noted at the time of the inspection.

AQD Staff met with Chuck Franks (Plant Manager), Matt Zrebski and Jason Petty, (Environmental) at the time of the inspection.

FACILITY –

Head quartered in Southfield, Michigan, a general internet query indicated that the Lear Corporation began in 1917 as American Metal Products, in Detroit, Michigan. The Lear Corporation is an international company and is reported to specialize in automotive seating and E-systems. The Lear Corporation Roscommon Plant (aka Lear) formally operated as ITT Hancock Industries, Inc. and ITT Hancock Engineered Products.

Aerial photographs indicated multiple building expansions to the north and west after 1998. Property immediately adjacent to the Facility is predominantly undeveloped.

Located at 10161 N. Roscommon Road, Roscommon, the Facility is apx. 0.5 miles south of the intersection of Squire Street and M-18 (aka N. Roscommon Road, Lake Street or Business 75) and apx. 1.2 miles south along M-18 from the intersection of M-18 and 5th Street in downtown Roscommon, Michigan. If traveling from I-75, the Facility is located approximately 1.6 miles north of the M-18 exit off I-75.

The Facility is considered a true minor source.

EQUIPMENT–

Metal Fabrication –

Production activities onsite as previously indicated are those associated with the production of car seat frames and include various types of metal forming, stamping and assembly equipment all equipped with Robo vent filters which emit into the general in-plant environment. Facility

staff report that the various equipment associated with making the metal frames changes and equipment is replaced as required depending on production needs but all emit into the general in-plant environment.

Based on the type of equipment and activities noted at the time of the site inspection it appears that that Rule 285(2)(l)(i) and 285(2)(l)(vi)(B) may exempt the equipment from Rule 201 permitting and reads as follows:

- *Rule 285(2)(l) The following equipment and any exhaust system or collector exclusively serving the equipment.*

(i) equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning or extruding either hot or cold metals

(ii) die casting machines.

(iii) equipment for surface prep of metals by use of aqueous solutions except for acid solutions.

(iv) atmospheric generators used in connection with metal heat treating processes.

(v) Equipment used exclusively for sintering of glass or metals, but not exempting equipment used for sintering metal-bearing ores, metal scale, clay, fly ash or metal compounds.

(vi) equipment for carving cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, stone, glass fiberglass or fabric which meets any of the following:

(A) equipment used on a non production basis.

(B) equipment that has emissions that are released only into the general in-plant environment.

(C) equipment that has external vented emission controlled by an appropriately designed and operated fabric filter collector that for all specified operations with metal is preceded by a mechanical precleaner.

Further evaluation based on Rule 278 and associated emission thresholds has yet to be made by the Facility. But the Facility reports meeting MIOSHA exposure thresholds.

Coating Line -The permitted coating line, is an "A-Coating line" (formerly referred to as an autophoretic coating) which uses Aquence, a Henkel® specialty coating. The line contains multiple tanks with acid solutions, alkaline solutions and deionized waters to clean the metal components

prior to being coated. The line contains two NG heaters that vent externally as well as a cure oven, and a supplemental tank to recycle the coating keeping the coating “fresh”.

A review of District Files identified a January 26, 2010, request for exemption for an Aquence cleaner line. The request identified exemptions under Rule 285 l(iii) and Rule 285(r). The exemption evaluation by District staff at that time indicated that the exemption Rule 285 l(iii) which does not allow use of acids, and Rule 285 (r) which only allows for emissions that are vented into the work environment. The January 26, 2010, correspondence specifically identified side draft venting to outside, though the Facility indicates in followup correspondence that outside venting was not installed.

A review of MSDS for the Aquence solutions and coating indicated that they did not contain VOCs. An internet search indicated that Aquence is a waterborne poly coating that adheres to ferrous material. Rule 121 defines a coating as “any paint, lacquer, varnish, ink, adhesive, or other coating material applied on a surface”.

At the time of document preparation, no information was available regarding the existing process heaters and cure oven associated with the Aquence cleaner line. One or more of these units may require permitting.

PERMITS–

A review of available records indicated multiple permits having been associated with the Facility. These include the following:

| Permit Number | Approval Date | Voidance Date | Equipment |
|---------------|---------------|---------------|---|
| 733-86 | 4/15/1988 | 9/27/2010 | 9 MIG welders, 7 Resistance welders, 3 surface grinders |
| 729-87 | unk | 5/20/1988 | Groundwater Cleanup |
| 859-89 | 11/9/1990 | 10/20/2004 | Air Stripper |
| 53-10 | 3/9/2010 | NA | General Permit coating lines up to 10 TPY VOC |

At the time of the inspection, the Facility was unaware of having a permit from the AQD. A hard copy was presented them for review. An electronic copy of general permit 53-10 was obtained from the AQD Permit Cards database and provided to the Facility during preparation of this document.

It should be noted that general permit templates contain the same conditions for all sources within the category. General permit templates used for issuing permits are updated (when necessary) to reflect the most recent wording of conditions as well as regulatory changes. Therefore the electronic version provided may reflect not only changes in permit layout, but also in conditions, however it is the template wording at the time of permit issuance that applies.

FEDERAL REGULATIONS-

A general evaluation of the Facility identified that the NG fired heaters are potentially subject to 40 CFR Part 63, Subpart JJJJJ Industrial, Commercial and Institutional Boilers at Area Sources. However, process heaters are excluded from the definition of boilers, and are not subject to the area source subparts.

COMPLIANCE-

As previously indicated the most recent site inspection was conducted on August 19, 2010. At that time no compliance issues were noted onsite. A review of AQD records indicates that no complaints have been received for the referenced Facility. No Violation Notices (VNs) are of record for the Facility.

The Facility is not required to submit annual emissions reports as part of the Michigan Air Emissions Reporting program.

Under 53-10 the Facility has requirements for each coating line (FG-COATING) as well as source wide (FG-SOURCE). Compliance with permit conditions is presented below.

FG-COATING -

This Flexible group consists of one or more single coating lines, associated purge and cleanup operations, associated control device and cure ovens. A review of the General Permit indicated that there are no material limits or reporting requirements associated with 53-10. In addition, based on the technologies in use at the Facility, the following permit conditions are not applicable:

- Design/Equipment conditions IV.1-5
- Monitoring/Recordkeeping conditions VI.1, 2, 5, 6 and 7

Emission Limits – Each coating line and associated purge and cleanup operations is limited to VOC emissions of 2,000 lbs per month (SC I.1) and 12 tons for each 12-month rolling time period (SC I.2). Based on MSDS sheets available, it appears that there are no VOCs associated with the various solutions used in the coating line, therefore no VOC emissions are occurring.

Process and Operational Restrictions- SC III.1 requires the permittee to properly capture, store and dispose of all waste associated with the line as well as any purge and cleanup operations. Material storage noted as part of the site walk thru did not identify any issues, work areas appeared to be clean and dry. No open containers were noted. Material disposal is reported to be conducted appropriately.

Testing- SC V.1 requires verification testing if approval for use of manufacturers formulation data has not been provided by the District Office. No testing data was requested as part of the August 19, 2010, site inspection, suggesting that the manufacturers data was/is sufficient to meet the requirement.

Monitoring and Record Keeping Requirements – Requirements include the following monthly records and calculations for each line (SC VI.3):

- Purchase order for all coating, reducer and purge/cleanup solvents in gallons
- VOC content of coating, reducer, and purge/cleanup solvents used and reclaimed
- Gallons of each coating, reducer, purge/cleanup solvent used and reclaimed
- VOC mass emission calculations determining monthly rate per coating line of total VOC emission using method in Appendix B
- VOC mass emissions in tons per 12-month rolling time period

In addition, the Facility is required to keep a current listing of information from the manufacturer regarding the chemical composition of each coating including weight percent of the components. (SC VI.4) The records are to be available upon request for a period of up to 5 years.

At the time of the inspection, the Facility was able to provide copies of use and purchase records for a period of up to 7 years and appropriate MSDS sheets to show general compliance with permit requirements. VOC calculations based on the data previously provided indicate that no VOCs are chemical components of the Aquence solutions used in the line.

Stack/Vent Restrictions - SC VIII.1 requires the coating line exhaust stack be unobstructed vertically, and a minimum total height of 1 ½ times the building height. Discussions with the Facility indicated that the coating line itself does not have any stacks to the outside atmosphere. Stacks do exist for the two NG fired process heaters associated with the line, and onsite staff confirmed that the stacks had been constructed to the proper height.

FG-SOURCE –

This FG consists of requirements for all coating lines and their associated purge and cleanup operations, associated control device and cure ovens. Permit conditions associated with the FG consists of VOC emission limits and recordkeeping requirements.

Emission Limits - VOC emission limits of 30 tons/year (SC I.1). This is superseded by the individual coating line VOC limit of 10 tons/year. As previously reported only one coating line is present at the site, and no VOCs are reported for the coating line.

Recordkeeping - FG-SOURCE is also required to maintain records of 12-month rolling total VOC emissions on a monthly basis and make those records available for review upon request. (SC VI.1) As previously indicated, a review of MSDS sheets for materials used in the coating line indicated no VOC content. As the Facility did not realize that they had a permit at the time of the most recent site inspection, records of emissions had not been maintained, but there would not have been VOC emissions to record.

SUMMARY –

On January 27, 2022, AQD District Staff conducted a scheduled site inspection of the Lear Corporation Roscommon plant (B1988) located at 10161 N. Roscommon Road, Roscommon, Roscommon County, Michigan. The referenced facility manufactures seating components, and presently operates a coating line(s) under General Permit No. 53-10. The referenced site inspection was conducted with the intent of determining compliance with the referenced General Permit. At the time of the inspection, the Facility was not aware that the existing coating line was permitted under AQD. A copy of the document was provided to the Facility at the time of the inspection.

The most recent site inspection was conducted on August 19, 2010. No compliance issues were noted at the time of the inspection.

Production activities onsite are those associated with the production of car seat frames, the frames being coated using an autophoretic process that makes use of a waterborne coating. No VOCs are reported to be associated with the various chemicals associated with the line. Records of material usage associated with the line have been maintained by the Facility, as have MSDS records indicating chemical compositions.

At the time of the January 27, 2022, site inspection the facility has been determined to be in general compliance with General Permit 53-10. Note that based on the absence of an external vent, the permitted coating line may meet exemption Rule 285(r). Further evaluation by the Facility will be conducted.

NAME _____

DATE _____

SUPERVISOR _____