DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B296639022

FACILITY: ITT AUTOMOTIVE ELSIE PLANT		SRN / ID: B2966
LOCATION: 222 PARK AVE, ELSIE		DISTRICT: Lansing
CITY: ELSIE		COUNTY: CLINTON
CONTACT:		ACTIVITY DATE: 03/23/2017
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection of PTI 29-12 for a soil and groundwater remediation system.		
RESOLVED COMPLAINTS:		

This report is for a scheduled inspection to check compliance with Permit to Install (PTI) No. 29-12 for a soil and groundwater remediation system. The system was located at the former ITT Corporation (SRN: B2966) in Elsie. There was no evidence of any activity in the Lansing District files that the system had ever been inspected.

Source Information:
Address: 222 Park Avenue, Elsie, Michigan 48831
MI EPA Facility ID: 110001441280
FILE: 3356/51466
NAICS Code: 336370 – Motor Vehicle Metal Stamping
SIC Code: 3465 – Automotive Stampings
Surrounding Area: The single story industrial building is bounded by Park Avenue and a public park to the west; a senior citizen housing complex to the south; a public elementary school to the east; and agricultural property to the north.

Contacts:
Anthony Finch, CPG, Senior Project Geologist, OBG, phone: 248-477-5701 Ext. 14, anthony.finch@obg.com
Kim Trask, kim.trask@itt.com

Inspection:
The source was originally constructed by Hancock Industries in 1969. Hancock Industries operated at this location from 1969 to 1972. Operations included metal stamping and the manufacture of automotive components. ITT Corporation owned and operated the plant from 1972 through August 1997. ITT Corporation was an automotive parts supplier which included seating systems, power seat adjusters, recliners, and related components. The following manufacturing operations are listed as having been conducted at the source:

*** Assembly operations**
*** Degreasing / cleaning**
*** Drilling / machining**
*** Grinding / polishing / buffing**
*** Heat treating**
*** Metal forming / stamping / forging**
*** Packaging**
*** Spray painting (liquid and powder)**
*** Welding**
*** Phosphating (including treatment of phosphate wastes)**

The following list of PTIs was issued to ITT Corporation:
PTI 55-78I – INCINERATOR BRULE--345#/HR TYPE 0 AND 1 (Voided 12/2/2014)
PTI 693-83 - FOUR RESISTANCE WELDERS (Voided 12/2/2014)
PTI 693-83A - TWO GAS SHIELDED WIRE WELDERS (Voided 12/2/2014)
PTI 694-83 - ELECTROSTATIC SPRAY PAINT SYSTEM (Voided 8/16/1989)
PTI 520-89 - PYROLYSIS OVEN (Voided 7/29/1996)
PTI 521-89 - POWDER PAINT SYSTEM (Voided 7/29/1996)

The plant was sold by ITT Automotive to Lear Corporation (Lear) in 1997. From 1997 to December 2007,

Lear operated the plant. Lear mainly did assembly of seat components, welding, riveting, testing, and machining (maintenance only). In July 2008, Lear sold the plant to be used as a warehouse. Since April 2010, the former plant has been occupied by Remandco Refrigeration which refurbishes food storage refrigeration equipment. Remandco Refrigeration does some painting, and has approximately 6 employees.

PTI 29-12
PTI 29-12 is for a remediation system that consists of soil vapor extraction (SVE) and air sparge (AS) with a vapor phase-dual stage adsorption unit consisting of two vessels in-series. The former industrial facility operated multiple degreasers. The system was designed to clean up the main contaminate which was perchloroethylene. The remediation system description on PTI 29-12 is as follows:

DESCRIPTION: A soil vapor extraction / air sparge (SVE/AS) remediation system consisting of air sparge wells, SVE wells and ancillary equipment, and air pollution control equipment for treating the off-gas.

POLLUTION CONTROL EQUIPMENT: Vapor phase dual-stage adsorption unit consisting of two vessels configured in-series. The adsorbent is either granular activated carbon (GAC) or polymeric adsorbent resin.

I spoke to Mr. Jim Innes, RRD, and he said the system is no longer operating and that site closure will be sought. I contacted the consultant on record (Mr. Anthony Finch) and confirmed that the remediation system had been removed from the site. The system was removed on November 23, 2016. I notified him that the PTI needed to be voided. I requested the records that were required to be kept to demonstrate compliance with PTI 29-12.

Records Review:
I was sent excerpts from the Interim Remedial Action (IRA) Operation Report – Former ITT Automotive Site, Elsie, Michigan, FILE: 3356/51466 dated July 6, 2016.

1. Table A summarizes the system flow rate and monthly, and cumulative VOCs emissions – The VOC emission limit for the SVE/AS system was 1 ton per year, and the actual total emissions during the 33 month performance period was 1.92 pounds.
2. Table B summarizes the adsorption control system monitoring results.

System startup was on October 23, 2012 and polymeric adsorbent resin was initially used as the treatment media. Per the requirements of special condition (SC) V.1, site visits occurred at least once every two weeks while the system was operating to check breakthrough. A summary of the system operation from Table B is as follows:

Dates - Notes
11/14/2012 – Analytical results above breakthrough criteria, operating order of treatment vessels reversed.
11/20/2012 – Analytical results received on 11/27/2012 indicated breakthrough, resin replaced on 11/29/2012.
12/12/2012 – Analytical results above breakthrough criteria, resin replaced with GAC on 1/14/2013.
3/27/2013 – Analytical results above breakthrough criteria, GAC replaced on 4/5/2013.
4/11/2013 – Operating order of treatment vessels reversed.
4/25/2013 – Analytical results indicate minor breakthrough, emission rate low (below PTI limits).
11/20/2013 – Analytical results indicate minor breakthrough, emission rate low (below PTI limits).
7/16/2015 – System shutdown for the final time.

The review of the records indicates that the remediation system was operated in compliance with PTI 29-12, SC I.1 and SC IV.1.

All records obtained in the course of this compliance inspection are attached to the file copy of the report.

Summary:

No instances of noncompliance with the special conditions of PTI 29-12, and state and federal regulations were identified. PTI 29-12 was voided on February 28, 2017. If further remedial action is needed to close the site, air quality regulations do have a number of exemptions from permitting for remediation activities or a PTI may need to be obtained.

NAME Julie T. Brunner DATE 3/23/17 SUPERVISOR B.M.