

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

N179868252

<b>FACILITY:</b> TOYO SEAT USA		<b>SRN / ID:</b> N1798
<b>LOCATION:</b> 2155 S. ALMONT AVE, IMLAY CITY		<b>DISTRICT:</b> Lansing
<b>CITY:</b> IMLAY CITY		<b>COUNTY:</b> LAPEER
<b>CONTACT:</b> Phil Swartz , Maintenance Manager		<b>ACTIVITY DATE:</b> 07/19/2023
<b>STAFF:</b> Daniel McGeen	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Inspection of facility last inspected by AQD in 2011.		
<b>RESOLVED COMPLAINTS:</b>		

On 7/19/2023, the Michigan Department of Environment, Great lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a scheduled inspection of Toyo Seat USA's Imlay City plant (Toyo Seat).

**Facility description:**

Toyo Seat USA manufactures and assembles components for automotive seats, as well as latches. This facility does mig welding in numerous welding cells.

**Environmental contacts:**

- Phil Swartz, Maintenance Manager; 810-724-0300; [pswartz@toyoseat.com](mailto:pswartz@toyoseat.com)
- Charity Dufort, Preventative Maintenance Clerk; 810-724-0300 Ext 1120; [cdufort@toyoseat.com](mailto:cdufort@toyoseat.com)

**EGLE, AQD contact:**

Dan McGeen (myself), inspector; 517-648-7547; [mcgeend@michigan.gov](mailto:mcgeend@michigan.gov)

**Emission units\*:**

- Welding unit(s); MAPC Rule 285(2)(i)
- Metal machining processes; MAPC Rule 285(2)(l)(vi)(A) and/or (B)

\*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.

**Regulatory overview:**

Toyo Seat is classified as a minor source in the Michigan Air Compliance Enforcement System (MACES) database, although a particular pollutant is not specified. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

This facility is considered a minor or *area source* for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

**A number of the Michigan Air Pollution Control (MAPC) Rules potentially apply. These rules exempt processes which meet the specified criteria from the requirement of MAPC Rule 201 to obtain a permit to install, aka an air use permit. The relevant exemption rules are:**

- MAPC Rule 285(2)(i) exempts brazing, soldering, welding, and plasma coating equipment.
- MAPC Rule 285(2)(l)(vi)(A) and (B) exempt, among other things, metal and wood machining processes which are either:
  - (A): used on a non-production basis, or
  - (B): exhaust only into the general, in-plant environment.

**Fee status:**

**This facility is not considered fee-subject, as it is not known to be a major source for criteria air pollutants, or for HAPs, nor is it subject to a federal New Source Performance Standard or a Maximum Achievable Control technology standard.**

**This facility is not required to report annual emissions through the Michigan Air Emission Reporting System (MAERS).**

**Location:**

- 2155 S. Almont, Imlay City, Lapeer County
- Description: Surrounded by a mix of industrial and commercial businesses. A residential subdivision is about 570 feet to the west.

**Operating schedule:**

- Two 10-hour shifts, Mon.-Thurs.
- Maintenance on Fridays.
- Overtime on Fridays or weekends.

**Required safety apparel:**

**Recommend safety glasses with side shields, and steel-toed boots. Hearing protection is required for anyone out on the plant floor longer than 6 hours.**

**Recent inspections:**

- 12/2/2011: Compliance
- 2/28/2008: Compliance

**Complaints:**

**None in the AQD Michigan Air Compliance Enforcement System database, which dates to 2007.**

**Odor evaluation:**

- Start time: 9:37 AM.
- Odors detected: None.

- Weather conditions: Sunny, hazy, 75 degrees F and humid, with winds 0-5 miles per hour out of WSW.

**Arrival:**

- Arrival time: 9:42 AM.
- Odors detected in parking lot: None.
- Visible emissions detected: None.

**AQD was represented by inspector Dan McGeen. This was a pre-arranged inspection, as he had attempted to conduct an unannounced inspection on 7/12/2023, when facility staff were not available. Therefore, this inspection was arranged in advance.**

**D. McGeen met with Phil Swartz, Maintenance Manager, and provided his credentials, per AQD procedure.**

**Inspection:**

**The facility has numerous welding cells, whose emissions are routed to two large Camfil-Farr cartridge filter control devices which sit outside the north wall of the plant. The facility does mig welding, via continuous feed production, D. McGeen was told, whereas tig welding would be manually fed. The indoor air appeared free of any visible particulate emissions.**

**The older Robo Vent dust collectors are no longer in use, D. McGeen was told, except for controlling emissions from service parts welding, which takes place occasionally. One such welding process was operating, and the Robo Vent collector, which exhausted indoors, had no visible emissions.**

**A resistance/projection welding process was observed, where current was applied to 2 metal surfaces, to make them molten. There was no exhaust, as no emissions were said to be produced. AQD witnessed no visible emissions.**

**Pressure drop readings for the two Camfil-Farr cartridge filter units were as follows:**

- East unit: 00.8 inches, water column (w.c.)
  - Warning sensor if at 0.6 inches, shut off at 2.0 inches w.c.
- West unit: 00.4 inches, w.c.
  - Warning if at 0.5 inches, shut off at 1.4 inches w.c.

**The two cartridge filters themselves were located outside the north wall of the plant. They were said to use pulse jets for the cleaning mechanism. They were reported to be serviced every 6 weeks. The exhaust outlet faced downward for each unit. There were no visible emissions.**

**Each unit routed collected particulate to two 55-gallon drums. The drums were in good condition, with tightly sealed lids. There was no spillage of material near the drums.**

**They have a maintenance shop with metal machining processes which were used on a non-production basis, and which were exhausted to the general, in-plant environment.**

**D. McGeen left the facility at 10:51 AM.**

**Conclusion:**

**No instances of noncompliance were identified. Housekeeping appeared good.**

NAME *David R. [Signature]*

DATE 9/26/2023

SUPERVISOR *RB*