

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

N200359927

FACILITY: Yanfeng US Automotive Interior -SOUTHVIEW/PMSC/CW		SRN / ID: N2003
LOCATION: 1600 S. WASHINGTON AVE., HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Jeff George , Environmental Lead		ACTIVITY DATE: 06/29/2021
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Announced Inspection		
RESOLVED COMPLAINTS:		

On June 29, 2021 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 1600 S. Washington Ave, Holland Michigan at 10:30 AM to conduct an announced air quality inspection of Yanfeng US Automotive Interior Systems II, LLC (hereafter Yanfeng). The inspection was announced due to COVID-19 restrictions/protocols. Staff made initial contact with the office receptionist and stated the purpose of the visit. Jeff George, Yanfeng, Quality & Environmental Systems Engineer, is the environmental contact and arrived shortly thereafter and took staff to his office for further discussions.

Yanfeng is a manufacturing facility that supplies plastic interior parts for the automotive industry. The facility is covered under two separate permits. One permit makes the facility an Opt-Out for HAP and the other covers EU-PARTSWIPE and EU-PLASTICPARTS.

Yanfeng was last inspected by the AQD on February 15, 2017, and appeared to be in Compliance at that time with PTI No. 267-00 and PTI No. 57-10A. Staff asked, and Mr. George stated that the facility does have cold cleaners and boilers.

Mr. George gave staff a tour of the facility. Required personal protective equipment are steel toe boots, safety glasses, high visibility vest, hearing protection, and a hard hat. Staff observations and review of records provided during and following the inspection are summarized below:

PTI No.267-00:

This PTI is a separate PTI that requires the facility to track facility wide emission for individual and aggregate HAP's. The PTI limits the individual HAP emissions to 9.1 TPY calculated on a 12-month rolling time period. The facility is also limited to 23.1 TPY calculated on a 12-month rolling time period.

The facility is maintaining the records for individual HAPs emissions. The records show that the facility reports 26 different individual HAP emissions. Based on the records it appears the largest individual HAP emissions are from Toluene. The largest 12-month rolling emissions are reported to be 3,3448.8 lbs per year or 1.7 TPY for a 12-month rolling time period. This is well below the 9.1 TPY limit. The facility is also calculating aggregate HAP emissions. The largest 12 month rolling emission limit was calculated to be 2.7 TPYS which occurred for the months of December 2019 through February 2020. This is well below the 23.1 TPY limit.

PTI No. 57-10A EUPARTSWIPE:

This emission unit is a plastic automotive interior part wiping process. Prior to being painted, the parts are hand wiped with a solvent to clean them. Emissions from this process are not directly vented to the outside atmosphere.

This emission unit has two emission limits associated with it. The first is a 5.9 TPY VOC emission limit that is calculated on a 12-month rolling time period. The second emission limit is a daily isopropyl alcohol (IPA) that limits the facility to 112 lbs. per day. The largest 12-month rolling VOC emission for EUPARTSWIPE was calculated to be 2.38 TPY in January 2020. The facility is also keeping daily records of IPA. Records reviewed from January 2020 through May 2021 showed that the facility would use around 1.75 pounds per day.

Special Condition V.1 requires the facility to determine the VOC content, water content, and density of any solvent, as applied and received, using the federal Reference Test Method 24. The condition also states that upon written approval by the AQD District Supervisor, the permittee may determine the VOC content from the manufacturer's formulation data. In a letter dated September 15, 2011 the facility does receive approval to use the manufacturer's formulation data. The approval letter does specify that approval may be revoked, and the method 24 testing could still be required.

Special conditions III.1-2 require that the facility capture all waste solvents and store them in closed containers. The facility is also required to handle all VOC containing materials in a manner to minimize the generation of fugitive emission. During the inspection the facility appeared to be complying with both these requirements.

PTI No. 57-10A EU-PLASTICPARTS:

This emission unit is a plastic air dried automotive interior parts coating line consisting of three paint spray booths, flash off zones, and a cure oven followed by a cooling tunnel.

This emission unit has two emission limits associated with it. The first is a 20.7 TPY VOC emission limit that is calculated on a 12-month rolling time period. The second emission limit is a VOC pound per hour emission limit that should be tested through stack testing. The largest 12-month rolling VOC emission for EU-PLASTICPARTS was calculated to be 3.27 TPY in March 2020. Stack testing was conducted on January 31, 2012 for the RTO and VOC emissions.

Special conditions III.2-4 require that the facility capture all waste solvents and store them in closed containers. The facility is also required to handle all VOC containing materials in a manner to minimize the generation of fugitive emission. Yanfeng is also required to dispose of spent filters in a manner that minimizes the introduction of air contaminants to the out air. During the inspection the facility appeared to be complying with both these requirements.

Special Condition IV.4 requires the facility to conduct the initial performance test of the non-fugitive enclosure for EU-PLASTICPARTS within 180 days after commencement of the trial operations. The facility is also required to repeat the testing semi-annually (every six months) thereafter. The last Natural Draft Opening test was on February 12, 2019. The facility has not tested the natural draft opening due to COVID-19 restrictions and having an issue getting testers in 2020. The facility has scheduled and conducted the test as of 8/14/2021. The facility has appeared to resolve and restored the testing of NDO requirements.

Special condition VI.6 requires the facility to maintain records that show the RTO is operating a temperature above 1500 degrees Fahrenheit. Staff was provided with records that showed on 1/22/2020, 2/18/2020, 8/11/2020, 9/29/2020, 10/8/2020, and 11/18/2020. On these reviewed dates the records showed that the RTO operates at a temperature above 1500 degrees Fahrenheit and appears to be in compliance based on the dates reviewed.

Coating Operations:

The facility has two coating operations that appear to use Rule 287 exemption. The two processes are the roll coat MDX operation and IMGL process. The records for these emission units are combined, but the gallons used in the emission units are always split 50:50. Staff mentioned to Mr. George that the facility should note that the coating usage is always a 50:50 split which is why they are recorded together and allow up to 400 gallons. The largest monthly gallons used is 388 gallons or 194 gallons minus water per emission unit. This appears to meet the requirements of Rule 287(2)(c).

Plastic Processing:

The facility does have several plastic molding operations. During the inspection it was noted that the facility had two SLUSH molding units that appear to be installed under Rule 286(2)(a). The facility also has multiple plastic injection molding emission units throughout the facility. During the inspection it was noted that the facility has 46 units located on the east side of the facility, while the facility was noted to have 24 units on the west side. These units appear to be exempt with Rule 286(2)(b). Yanfeng also has one reaction injection molding emission unit. This unit appears to be exempt with Rule 286(2)(e).

Rule 290:

The facility operates a few emission units under Rule 290.

EU-SVCOATOP (Trim Bond Heat Activated): Record review of this emission unit showed that the facility appears to be categorizing the emissions for the chemicals screening levels correctly. Emissions for this emission unit had a monthly maximum of 66.6 lbs during May 2020. This is well below the allowed 1,000 lbs.

EU-LACQUERTHINNER#75: Record review of this emission unit showed that the facility appears to be categorizing the emissions for the chemicals screening levels correctly. Specific chemical identified in this emission unit were Toluene and Methanol along with VOCs. The facility calculates 747.5 lbs of monthly emissions. This is below the allowed 1,000 lbs.

Combustion Sources:

The facility has four different combustion sources that use natural gas as fuel. These emission units appear to be exempt from Rule 282(2)(b)(i).

Printed Circuit Board Manufacturing:

The facility does have a room that is dedicated to printed circuit board manufacturing. Due to the nature of the manufacturing and electrostatic and dust being concerns there are certain dressing requirements needed to enter the room. Staff was able to observe the room and manufacturing

process from a window. The process is has a lot of soldering and clean-up of metal components that are only released to the general in plant environment. The process appears to meet the requirements of exemption rules Rule 285(2)(i) and Rule 285(2)(r)(iv).

The facility is tracking overall VOC emission from the process. These emissions are calculated to be around 200 lbs. per month for the whole operation. These appear to meet the requirements of Rule 290. The facility may also use Rule 287(2)(c) as well for just the conformal coating operations. The facility estimated that it uses 67 Kg of coating per year. This is an estimation and if the facility wanted to used the gallons usage would have to track individually.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with PTI No. 267-00 and PTI No. 57-10A. Staff stated to Mr. George that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 12:30 PM.-CJY

NAME Cathy Yung

DATE 9/20/21

SUPERVISOR RIL 9/22/21