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

M358222029

FACILITY: IAC Group ,ALMA,LLC (Formally Lear Corporation)		SRN / ID: M3582
LOCATION: 1965 WILLIAMS RD, ALMA		DISTRICT: Lansing
CITY: ALMA		COUNTY: GRATIOT
CONTACT: John McConkie , Plant Technical Manager		ACTIVITY DATE: 07/24/2013
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled compliance inspection of opt-out source to determine if IAC is meeting the Title V opt-out requirements.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow
Personnel Present: John McConkie (jmcconkie@iacna.com), Plant Technical Manager

Purpose: Conduct an unannounced, scheduled, partial compliance evaluation (PCE) inspection by determining compliance with International Automotive Components' (IACs) Permit No. 170-79F, including verification that IAC stayed within the permit's emission limits to remain an opt-out source and not enter into Title V status. This inspection was done as part of a full compliance evaluation (FCE).

Facility Background/Regulatory Overview: IAC is involved with making interior automotive parts, using mold-injection, hand-spray painting of interior automotive products (such as consoles, for Ford, Toyota, Chrysler, and GM), applying "fabric" to the interior automotive parts, and assembling the interior automobile parts (for example, installing light tubes and wiring in overhead consoles).

IAC is an opt-out facility. VOCs and propylene carbonate are limited to 13.9 tpy from FGCOATING, and each individual HAP and aggregate HAPS are limited to less than 9.0 tpy and less than 22.5 tpy, respectively, for FGFACILITY.

J. McConkie said that IAC has plans of installing a new paint line in 2014, to adapt to incoming business for the Camaro and become a Class A paint facility. There are also plans to upgrade the adhesive line from manual spray applications to robotic spray applications.

Inspection: At approximately 9:45 a.m. on July 24, 2013 I arrived at IAC. I met John McConkie in the lobby at approximately 10:00 a.m. I gave J. McConkie a DEQ "Environmental Inspections: Rights and Responsibilities" brochure, my business card, and a May 2012 Permit to Install Exemptions Handbook.

J. McConkie said there are 42 mold injectors/presses that can press from 90 to 2200 tons. All mold injectors/presses located on the site are exempt from obtaining a PTI per Rule 285 (l)(i).

FGCOATING

The FGCOATING consists of one adhesive coating booth (EUADHESIVELN) and four hand-spray coating booths (EUBOOTH1-4). The spray booths have two ovens which are vented through one stack (SVIROVENS). Each booth has its own stack (SVBOOTH1-4). The adhesive line has 1 stack for the adhesive coating booth (SVADHESIVELN) and 1 stack for the natural gas-fired oven (SVNATGASOVEN). In the EUADHESIVELN, an adhesive coating is sprayed onto TPO (vinyl) and then sent through the oven to remove moisture from the adhesive at 140-180°F, allowing the TPO to bind to the plastic.

II. Material Limits

See attachment 3. The highest VOC content for EUBOOTH1-4 is 2.059 lbs/gal (minus water) for coating 364W Series. The VOC content (minus water) limit is 3.5 lb/gal as applied. The highest VOC content for EUADHESIVELN is 0.3 lb/gal VOC (minus water). The VOC content (minus water) limit is 0.3 lb/gal. IAC is in compliance with all material limits at this time.

III. Process/Operational Restrictions

SC III.1 requires that all waste materials be captured and stored in closed containers and should be disposed of in an acceptable manner and SC III.3 also requires containers be covered at all times, except for operator access, to minimize the generation of fugitive emissions. J. McConkie said that IAC's waste materials consist of paint, water and oil/water (from cleaning oil off the floors). He said that the coating and adhesive lines are flushed out with water and captured in a 5 gallon pail which is then pumped to a large plastic waste container (all materials, according to J. McConkie, are water-based). I was not able to verify the collection of waste from purging and cleaning of the coating lines, as it was not being done during the inspection. The large plastic waste container, which holds all liquid waste, was not closed. I did not cite IAC for a violation of SC III.1, but told J. McConkie to close all waste containers as soon as possible, and during future inspections, I expect them to be closed.

An outside company picks up the waste containers for disposal of the waste. J. McConkie said he believes the company also separates the water waste from the oil and paint sludge to recycle the water. He said the two companies are EQ Industrial Services for the hazardous waste, and Stoddard Oil for waste water/oil.

IAC is in compliance with SC III.1 and SC III.3.

SC III.2 requires spent filters be disposed of in a manner which minimizes the introduction of air contaminants to the air. J. McConkie said that spent air filters are placed in a barrel near the hand-spray paint booths and then placed in garbage bags to be thrown in the dumpster once the barrel is full. IAC is in compliance with SC III.2.

J. McConkie said that IAC does not use VOC containing purge and cleanup solvents in the FGCOATING emission units. IAC is in compliance with SC III.4, requiring no VOC-containing purge and cleanup solvents be used in FGCOATING.

J. McConkie said the racks used to carry the interior automotive parts into the coating booths are occasionally cleaned by soaking them in drums containing soap and water.

IV. Design/Equipment Parameters
I verified that all fabric filters in the 4 hand-spray booths and in the adhesive coating booth were installed properly (i.e. the filters completely covered all vented openings). For maintenance of the exhaust filters, J. McConkie said they monitor the pressure drop gauges (manometers measuring specific gravity). The needle must be within a predetermined acceptable range; if not, the filters are replaced. For example, on the adhesive coating booth, a manometer is marked at 0.15 inches water and at 0.27 inches water. J. McConkie said that if the gauge needled drops below 0.15 inches of water, the filters are replaced. The acceptable pressure ranges vary among the paint booths and between the paint booths and the adhesive line. All booths were operating within the appropriate ranges. IAC is in compliance with SC IV.1.

According to SC IV.2, IAC is required to keep test caps available for pressure testing of high-velocity low-pressure (HVLP) applicators. J. McConkie verified that they have HVLP applicators and showed me the test caps. He said they never use the test caps because they atomize at a low pressure (23 lbs) which he said is greatly lower than the HVLP regulations, and transfer efficiency is better at lower pressures. IAC is in compliance with SC IV.2.

V. Testing/Sampling
J. McConkie said that his spreadsheet calculations are based on the manufacturer's formulation data for each of the materials used. VOC content, water content (% that includes exempt materials), and density of all materials are recorded in an excel spreadsheet (see attachment 3). IAC is in compliance with SC V.1.

VI. Monitoring/Recordkeeping
J. McConkie provided me with several records for IAC's recordkeeping of VOCs, propylene carbonate, and HAPs. All records provided were completed up through June 2013. SC VI.1 requires that required calculations be completed by the 15th day of the month for the previous calendar month. IAC is in compliance with SC VI.1.

SC VI.2 requires IAC to keep a current listing of the chemical composition of each material, including weight % of each component. J. McConkie provided me with the MSDS's and environmental data sheets for each compound listed in the VOC/propylene carbonate/HAP records he provided. The weight % of VOC was included in either one or both of the documents for each material used. The MSDS/environmental data sheets for CI-5608B and CI-6575A are considered confidential by IAC and will therefore be kept in AQD Lansing District's confidential files. IAC is in compliance with SC VI.2.

J. McConkie provided me with a spreadsheet that keeps track of the total number of gallons (includes water) of each of the coatings used (see attachment 1) and also provided me with the same record and a signature certifying that the number of gallons used was collected by July 15th. IAC is in compliance with SC VI.3a

J. McConkie emailed me IAC's working spreadsheets to verify the mass emission calculations for VOC and propylene carbonate emissions on monthly and 12-month rolling bases; the working spreadsheets also include the VOC content of each material with and without water, and the propylene carbonate content with water of each material applied (IAC is in compliance with SC VI.3b). VOC and propylene carbonate mass emissions have been recorded on a monthly basis (see attachment 2 for example). Commercial # CI-5608B is the only material containing propylene carbonate. I verified a few of the calculations embedded within the excel spreadsheet to be accurate calculations of emissions. IAC is in compliance with SC VI.3d. The 12-month rolling VOC and propylene carbonate mass emissions from July 2012 – June 2013 was a combined total of 2.1 tons (4,230 lbs). The mass emission limit is 13.9 tpy for VOC and propylene carbonate. IAC is in compliance with SC VI.3e.

VIII. Stack/Vent Restrictions
Verification of the stack heights for all stacks was done by J. McConkie. He said that all paint-related stacks (SVBOOTH1-4 and SVIROVENS) are 10'6" above the roof. He said the roof height is 21'11". Total height above ground for these stacks is 32'5". The permit requires the stacks to be at least 31' above ground. The SVADHESIVELN, J. McConkie said, is 14' above the roof. The total height for this stack is 35.5'. The minimum required height is 35' above ground. IAC is in compliance with

SC VIII for all stack heights. The SVADHESIVELN is the only stack that was not obstructed. All other stacks had "caps" on them. IAC is in compliance with stack characteristics. There was no opacity emitting from any of the stacks during the inspection.

IX. Other Requirements
I verified that all booths and ovens (except for the adhesive line oven) were appropriately labeled. IAC is in compliance with SC IX., requiring all booths and associated ovens be labeled.

FGFACILITY
IAC has individual and aggregate HAP limits.

V. Testing/Sampling
J. McConkie said that his spreadsheet calculations are based on the manufacturer's formulation data for each of the materials used. IAC is in compliance with SC V.1 for determining HAP content based on manufacturer's formulation data.

VI. Monitoring/Recordkeeping
J. McConkie sent me working excel spreadsheets of all calculations. Attachment 3 contains a table with the HAP content of each HAP-containing material used in volume % (Commercial # 364W Series) and weight % (lbs/lb) (Commercial #'s 396W Series, CI-6575A, CI-5608B, PPG T8085). According to the attachments provided by J. McConkie, all materials, except for PPG T7944, contain HAPs (either one or a combination of the following: acrylonitrile, formaldehyde, vinyl acetate, "HDI", and chlorobenzene), and all gallons of material used are recorded on a monthly basis. . I verified that the wt% used in the HAP emission calculations were the same as those listed in the formulation data, except for the HAP content of commercial ID 364W Series and 396W Series. I will work with IAC in the future to learn how HAP contents for these two materials was determined, because the formulation data sheets did not provide them.

I verified with a few of the calculations embedded within the excel spreadsheet that the calculations of HAP emissions per month and per 12-month rolling time period are accurate. Individual HAP emissions do not exceed 9.0 tons/year, based on a 12-month rolling time period. The largest emission of HAP is from formaldehyde at 0.01 tons/year. Aggregate HAPS did not exceed 22.5 tons/year, based on a 12-month rolling time period. Aggregate HAPS emissions totaled 0.03 tons/year. IAC is in compliance with the emission limits for individual and aggregate HAPS.

J. McConkie said that IAC does not use reclaimed HAP-containing material. IAC is in compliance with SC VI.2a-e.

Compliance statement: IAC is in compliance with state or federal regulations at this time.

Inspector's Safety and Health: Those entering the facility are required to electronically sign in and watch a safety presentation. After confirming you've watched the presentation a "badge" is printed out for you.

Safety glasses are absolutely required. J. McConkie said there are no respiratory hazards throughout the plant and there were no odors I detected during the inspection. Hard hats are not required.

NAME Mcklly M/ Lyons DATE 8.28-13 SUPERVISOR