

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

P029328555

FACILITY: ETERON INC.		SRN / ID: P0293
LOCATION: 23944 FREEWAY PARK DRIVE, FARMINGTN HLS		DISTRICT: Southeast Michigan
CITY: FARMINGTN HLS		COUNTY: OAKLAND
CONTACT: Don Stumpf, Director of Quality		ACTIVITY DATE: 01/21/2015
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, January 21, 2015, I conducted an annual inspection at Eteron Incorporated located at 23944 Freeway Park Drive, Farmington Hills, Michigan. The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994 and Permit to Install (PTI) No. 9-12.

I arrived at the facility at about 10:15 AM. At the facility I met Mr. Don Stumpf, Director of Quality. I introduced myself and stated the purpose of the inspection. During the pre-inspection meeting, he explained his facility's operations. The facility started operations in 2001. They have 85-90 employees, operates two shifts per day (6:30 AM-2:30 AM, five days (Monday-Friday) per week.

The facility is mainly involved in the flocking (fiber coating) of internal automotive components such as glove boxes, storage areas and other internal compartments for automotive manufacturers such as GM, Chrysler, Ford, Nissan, BMW, etc. The parts are coated with adhesive followed nylon fiber coating. The coated parts are then dried in natural gas fired ovens. Mr. Stumpf told me that they don't use any cleaner to clean the parts before coating. The facility uses lacquer thinner to clean tools (wiped).

The facility mostly flocks plastic internal components. The plastic parts are adhesive coated and flock applied in separate coating booths. Once or twice in a year it also flocks metal parts such as clips. This is done in an enclosed clip line (Grommet Line). They use two parts epoxy coating for metal parts.

Mr. Stumpf informed me that they don't currently perform parts coating for industrial business machines. But they want to have the flexibility to make these parts if needed.

The adhesive coating is conducted in coating booths equipped with particulate control filters. Facility has 12 adhesive coating booths plus 1 adhesive application for the clip line and 5 flocking booths plus 1 flocking application in the clip line. Clip line booths and oven are in one single unit. Each coating booth has individual stack. The overspray from the flock coating booth is collected using a cyclone and sock filter bags. The collected powder (flock) is reused. The exhaust from the bags is vented in to the general in-plant area. The facility has two natural gas fired dryer ovens of 500,000 BTU/hr each.

During the meeting we also discussed the draft PTI No. 90-14A and the draft Consent Order. I advised him to review the conditions thoroughly and make comments regarding these documents.

He informed me that only part of the manufacturing process was operating on that day because of an electricity power issue in the building.

After the process discussion, he accompanied me for an inspection of the facility. I observed that only few of the booths were operating. The filters in operating booths were in place. He told me that the filters are replaced 2-3 times per day.

He told me that currently and for a year they are mainly using solvent based adhesive. They haven't used primer for a year now. Water based solvents cannot be used without primer on poly propylene and PVC Polypropylene parts. ABS parts can use water based adhesive without primer. They are trying to develop a water based adhesive that can be coated without the use of primer.

The facility also has a natural gas fired burn off oven (350,000 BTU/hr) to clean masking tooling parts. The burn-off oven is covered under PTI NO. 9-12. The Burn-off oven was not operating at the time of my inspection. He told me that they use the burnoff oven only during second shift for 4-5 hours and couple of times a week. He provided me copies of the temperature records.

On Thursday, February 12, 2015, I visited the facility to verify the operation of the booths which were not operated during my previous day visit. The booths were in operation and filters were in place and in good condition.

PTI No. 9-12:

The facility operates the burn off oven during the second shift. I did not verify visible emissions from the oven. The burn off oven only uses natural gas as fuel. The oven is used only to burn off cured adhesives and fiber parts. Mr. Stumpf told me that the oven is equipped with a secondary burner. The oven is equipped with two thermometers. Mr. Stumpf told me that the thermometers are calibrated. The facility is keeping information for the chemical composition of the materials used in the booths.

Compliance:

During 2013 Inspection AQD identified that the facility is a major source of HAP emissions and subject to the MACT Standards. The facility's coating operations are currently subject to 40 CFR 63, Subpart PPPP-NESHAP for Surface Coating or Plastic Parts and Products; 40 CFR 63, Subpart MMMM-NESHAP for Surface Coating of Miscellaneous Metal Parts and Products and 40 CFR 60, Subpart TTT-Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines.

Notice of Violations seeking compliance with the NESHAP standards, failure to submit permit to install applications and failure to submit Title V (ROP) permit application were sent. Facility submitted PTI application on October 13, 2014 and is currently under technical review. Due to the violation of the federal regulations, the case was referred to AQD Enforcement section for escalated enforcement actions. The AQD and the facility negotiated a consent order which is currently out for public comment. In order to comply with the MACT standards the facility agreed to install a regenerative thermal oxidizer and use the "Emission rate with add-on controls option" to comply with the MACT standard.

Conclusion: The facility is currently in violation of Rule 201-Permit to Install Requirements, Rule 210-Submittal of ROP, 40 CFR 63, Subpart PPPP and 40 CFR 63, Subpart MMMM requirements. The facility expects to be in compliance with the issuance of PTI, Consent Order, the installation and testing of RTO and the submittal of Notification of Compliance Status to USEPA.

NAME S. Kallumkal

DATE 2/13/15

SUPERVISOR CJE