

M4086

MANILA

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

M408649040

FACILITY: TOYOTA MOTOR NORTH AMERICA		SRN / ID: M4086
LOCATION: 14655 JIB STREET, PLYMOUTH TWP		DISTRICT: Detroit
CITY: PLYMOUTH TWP		COUNTY: WAYNE
CONTACT: Terryl Blackmore , Senior Engineering Manager, M&O		ACTIVITY DATE: 03/22/2019
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspeiton		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : March 22, 2019
TIME OF INSPECTION : 9:45 pm
NAICS CODE : 336399
EPA POLLUTANT CLASS : VOC
INSPECTED BY : Jill C. Zimmerman
PERSONNEL PRESENT : Benjamin and Tyler
FACILITY EMAIL ADDRESS : Kelly_poe@caltly.toyota.com

FACILITY BACKGROUND

Toyota Technical Center currently is the owner of this facility and leases the facility to Caltly Design Research (Caltly). Caltly is currently using one paint booth for vehicle painting. The remaining two paint booths are not being used and are not wired to be able to operate. Based on an internet search, Caltly is a subsidiary of Toyota.

COMPLAINT/COMPLIANCE HISTORY

The facility was last inspected in 2018. At this time, no one was present at the facility. It was explained to me by Mr. Patrick Sickon from Toyota that the facility was used in a limited amount by a third-party company leasing the space. I explained to Mr. Sickon that Toyota was still responsible for maintaining compliance with the current permits and emission reporting.

OUTSTANDING VNs

No Violation Notices (VN) have been issued regarding this facility.

PROCESS EQUIPMENT AND CONTROLS

Caltly paints vehicles on an as needed basis. Caltly has a facility in Ann Arbor, Michigan. This Plymouth location is used for overflow work. The facility has three paint booths at this location. However, only one paint booth is wired to be operational. Filters are used to collect over spray and were present during the onsite inspection. Spare filters were stored onsite. The remainder of the facility appeared to be used for storage.

INSPECTION NARRATIVE

I arrived at the facility at 9:45 am. I met with Benjamin and Tyler at the facility. They explained that they were unaware of any permits associated with the paint booths. They were also unaware of any record keeping requirements, including emission calculations for VOC emissions and HAP emissions. I shared a copy of the permits with Benjamin and Tyler. Benjamin suggested that I contact Ms. Kelly Poe (poe_kelly@caltly.toyota.com) to help determine the required records.

During the onsite inspection, filters were present in the one spray booth. Tyler stated that replacement filters are onsite, though tests of the current filters show that replacement is not needed at this time. Tyler stated that, though there are 3 spray booths at this location, only

one is wired to be operational at this time.

On Friday March 22, 2019 I sent the attached email to Ms. Kelly Poe and Mr. Terry Blackmore, formally requesting usage and emission records. A response was received on April 19, 2019 and is attached to this report.

APPLICABLE RULES/PERMIT CONDITIONS

This facility is currently operating under Opt-Out permit 146-10 for hazardous air pollutants (HAPs) and permit to install (PTI) 204-01, which is a general permit for a coating line. Toyota has not used this equipment since about February 2017. The equipment is used by a third party facility, who was unaware of the permit conditions. Toyota is responsible for demonstrating compliance with all permit conditions. Caltly was unaware of the permit requirements, including recordkeeping and emission calculations. I shared a copy both permits with Benjamin and Tyler for their records. They stated that they would be working with coworkers and purchase records to determine usage records and emission calculations for the past year. I also contacted Ms. Kelly Poe to help determine this information.

Mr. Terry Blackmore, the Toyota contact listed in MAERS, stated in email that the paint booths did not operate between March 2017 and December 2018 because the operations at this location moved to York Michigan. One paint booth has operated since January 2019.

The special conditions for Permit 204-01, which is a general coating permit, are as follows:

FG-COATING

- I. Emissions: Compliance – The facility has emitted less 140 pounds of VOC in the past 12 months, with 94 pounds emitted during February, the highest monthly emissions. This is less than 2000 pounds per month and 10 tons per year.
- II. Material Limits: NA
- III. Process / Operational Restrictions: Compliance – The facility properly contained all waste materials associated with the coating operations.
- IV. Design / Equipment Parameters
 - 1. Compliance – HVLP spray applicators were being used to apply the coating.
 - 2. Compliance – Dry filters were present during the onsite inspection.
 - 3. NA – No oxidizers are used at this location.
 - 4. NA – No oxidizers are used at this location.
 - 5. NA – No oxidizers are used at this location.
- V. Testing / Sampling: NA – No testing is required at this time.
- VI. Monitoring / Reporting: Compliance – No oxidizers are used at this location. All coating records are attached to this report. The paint booth did not operate until January 2019. Monthly records are attached to this report for the past 3 months.
- VII. Reporting: NA
- VIII. Stack / Vent Restrictions: Compliance – No modifications have been made to the stacks.
- XI. Other Requirements: NA – The equipment has been replaced or modified since the last inspection.

FG-SOURCE

- I. Emission Limits: Compliance – Based on the collected records and the most recent MAERS report, the facility is emitting less than 1 ton of VOC during the past 12 months.
- II. Material Limits: NA

- <http://intranet.deq.state.mi.us/maces/WebPages/ViewActivityReport.aspx?ActivityID=2471...> 6/6/2019