

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

N3903  
FY 2018 Insp-

N390342655

FACILITY: Polyflex Products		SRN / ID: N3903
LOCATION: 23093 COMMERCE DR, FARMINGTON		DISTRICT: Southeast Michigan
CITY: FARMINGTON		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 10/23/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2018 inspection of Polyflex Products		
RESOLVED COMPLAINTS:		

**Polyflex Products (N3903)**  
23093 Commerce Dr.  
Farmington Hills, Michigan 48335-2721

**Reassign SRN (Oct 2012): Giffin, Inc., DBA Giffin Finishing Systems, Giffin International (N3903) → Polyflex Products (N3903). About December 2010, Giffin moved out to 1900 Brown Road, Auburn Hills (N2109).**

**PTI Void: PTI No. 478-93 (issued / approved: 08/11/1993 & voided: 09/05/2000) for paint spray booth issued to Giffin.**

On October 23, 2017, I conducted a level 2 self-initiated annual **FY 2018 inspection** of Polyflex Products, a material handling and packaging products company, located at 23093 Commerce Dr., Farmington Hills, Michigan 48335-2721. The inspection was conducted to determine compliance with the Federal Clean Air Act (CAA); Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 (PA 451); and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the FY 2018 inspection, Mr. Aron Fedewa (Phone: 734-469-5099; Cell: 248-535-5063; Fax: 248-477-9000; E-mail: FedewaA@polyflexpro.com), Plant Manager, assisted me.

Mr. Marius Rauckis (Ph: 734-469-5099; Cell: 248-379-1500; Fax: 248-477-9000; E-mail: rauckism@polyflexpro.com), Chief Financial Officer, and Mr. Mark Kirchmer (Ph: 734-469-5094; Fax: 248-477-9000; Cell: 734-634-8465; E-mail: kirchmerm@polyflexpro.com), Chief Executive Officer, were not present.

All furniture and process equipment belonging to Giffin was moved to 1900 Brown Road, Auburn Hills. Mr. Noto, a Forman with Giffin, stated that the booth would be moved by January 2011. Almost all other process equipment was moved by December 2, 2010. PTI No. 478-93 for paint spray booth belonging to Giffin was voided on September 5, 2000, and the booth was moved to Auburn Hills (N2109).

Polyflex makes material handling and packaging products using thermoplastic injection molding (TIM can be recycled), reaction injection molding (RIM cannot be recycled) and cast urethane (two-component polymer RIM). Polyflex makes both reusable and expendable packaging products. Polyflex employs about 50 people in Michigan.

Thermoplastic, RIM urethane, cast urethane processes and equipment are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1286.

Different designs of shipping and packaging products are specifically designed for given parts.

Several injection molding machines are present in two lines (Thermoplastic and RIM):

1. HiTech RIM urethane (2 liquid component ISO & Poly) molding machine is present. Material is poured into molds.
2. Gumer RIM urethane machine
3. ESCO RIM urethane machine
4. Three Cincinnati Milacron Thermoplastic injection molding machine are present. Dry polymer materials (pallets of polypropylene) are used. Heat melts polymer.
5. Two Toshiba (600 tons, 500 tons; 390 tons machine removed about July 2017) thermoplastic molding machines are present. Dry polymer materials (pallets of polypropylene) are used. Heat melts polymer.
6. One Cincinnati Milacron (220 ton) thermoplastic injection molding machine is present.
7. JSW thermoplastic machine
8. TMC 500-ton thermoplastic machine - removed
9. Van Dorn 1000-ton thermoplastic machine – removed and replaced with Krauss Maffei thermoplastic machine.

10 gallons per month mold release agent is used in RIM machines. 40 boxes per month, 12 cans per box, 20 oz. per can, spray can mold release agent used in TIM machines. No exhaust to outside ambient air.

No painting. No cold-cleaner.

### Conclusion

Thermoplastic, RIM urethane, cast urethane processes and equipment are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1286.

NAME J. S. Hennahall DATE 12/12/2017 SUPERVISOR John E.