

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

P009372202

|                                                             |                               |                           |
|-------------------------------------------------------------|-------------------------------|---------------------------|
| FACILITY: ABC Technologies                                  |                               | SRN / ID: P0093           |
| LOCATION: 4247 Eastern Ave, WYOMING                         |                               | DISTRICT: Grand Rapids    |
| CITY: WYOMING                                               |                               | COUNTY: KENT              |
| CONTACT: Alex Tagaras , EHS Mgr                             |                               | ACTIVITY DATE: 06/11/2024 |
| STAFF: April Lazzaro                                        | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR       |
| SUBJECT: Unannounced inspection in response to a complaint. |                               |                           |
| RESOLVED COMPLAINTS: C-24-01273                             |                               |                           |

Staff, April Lazzaro arrived at the facility to conduct an unannounced inspection in response to a complaint. Upon arrival, no odors or visible emissions were identified, however it was noted that there is a large amount of outdoor storage of empty shipping pallets and containers. I met with Alex Tagaras, Senior Environmental Health and Safety (EHS) Specialist and Mazie Ehler EHS intern.

#### FACILITY DESCRIPTION

ABC Technologies is a Tier 1 automotive supplier of plastic parts. This facility conducts plastic injection molding, plastic blow molding and some infrared (IR) welding and minor maintenance welding activities. There are approximately 8 plastic pellet storage silos at the facility. The facility currently operates 3 shifts a day and has approximately 170 employees between production and office staff.

The complaint that was received was related to both water and air related issues, including plastic and oil going into drains and fiberglass in the plant air, as well as plastic burning from the welders.

This geographic location also has one permit for a soil vapor extraction treatment system, operated under the name of Smiths Industries. AQD has discussed this unit with that company consultant who stated that the unit is not operating, but that they did not want to void the permit. Alex Tagaras stated that it is present but is not operational and they do not manage it, rather the building owner does. At this time, the permit will remain active.

#### COMPLIANCE EVALUATION

The facility provided a full tour of the facility, including the injection molding and blow molding equipment. We discussed mold release, and learned that at the beginning of start up for the injection molds, they use a aerosol can mold release to prime the die. The facility is not conducting production scale mold release application or use.

We observed the plastic injection molding regrind area, which is internally vented and there are separate machines for the different colors used. The blow mold regrind units are situated next to the blow mold equipment and are internally vented, and the regrind is sent back into the blow mold unit for reintegration. While there was an odor of plastic in the plant, the air appeared acceptable at the time of the inspection. Additionally, the facility stated that they do not use any fiberglass in the plastic resins at the facility.

Air Quality Division (AQD) staff also requested to view any floor drains in the facility, since the complaint indicated that plastic and oils were going down drains. There were some floor drains present previously, but these have either been capped or cemented over. In general, I did not see oils or plastic residue in excess inside the facility. I also did not observe smoke or particulate generated by the IR welding with the plastic. I also was shown the plastic molding equipment cooling towers and chillers which are in a separate room. No obvious AQD issues were noted in that area, however I did note that a waste oil tote needed labels.

The Permit to Install exemptions for the processes at the facility were discussed and it was determined that there had been an environmental assessment done, and they would review that documentation. To ensure an accurate review, the emission factors for both volatile organic compounds (VOC) and particulate matter (PM) for plastic processing equipment were provided to the company. Emissions calculations were requested and received timely. The facility had been advised that since there were no stacks to the plastic injection equipment, that no AQD rules applied. Michigan Rule 201 states (in part) that a process or process equipment that may emit an air contaminant is subject to the rule. The emissions generated from the plastic injection molding equipment would be expected to become an air contaminant by exiting out the facility through open bay doors and general ventilation. The company calculated that particulate matter emissions would be 1,736 pounds and VOC emissions would be 818 pounds for the entire facility. These emission rates are less than the significance levels identified in Rule 119, and as such, the permit exemptions are applicable. Rule 286(2)(b) for plastic processing equipment plastic injection molding and Rule 286(2)(c) for plastic blow molding are appropriate exemptions. The plastic welding is exempt pursuant to Rule 286(2)(f). The use of aerosol cans to apply the mold release is exempt per Rule 287(2)(b). Based on the equipment observed at the facility, no further action is needed.

#### SUMMARY

ABC Technologies was in compliance at the time of the inspection.

NAME April Lazzaro

DATE 06/18/2024

SUPERVISOR 