



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

B365824310

FACILITY: MARTINREA INC		SRN / ID: B3658
LOCATION: 10501 M-52, MANCHESTER		DISTRICT: Jackson
CITY: MANCHESTER		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 01/31/2014
STAFF: Glen Erickson	COMPLIANCE STATUS: Pending	SOURCE CLASS:
SUBJECT: Inspection prompted by company request to evaluate operations following their ISO 140001 training.		
RESOLVED COMPLAINTS:		

Scheduled inspection with Kristy LaGrange, Health & Safety Coordinator, Martinrea--Bishop Circle Assembly, 734-428-2525.

Inspection was prompted by LaGrange's inquiry about air use permits and her facility, after she attended company ISO 140001 training. She indicated that she has been at facility for 3 years. AQD has no file for Martinrea in Manchester. I asked her if the facility had previously been another company, but she did not know. I told her it would be simplest for me to just visit and inspect her facility.

While awaiting for LaGrange in the company reception area I found a book that had a stamp indicating it had been the property of Pilot Industries. When we went to her office I indicated that things would have been less confusing if I had known this facility was previously a Pilot Industries plant.

I told her I was pretty sure AQD had a file for Pilot Industries, and I would expect that most of the processes had already been evaluated relative to air permits if Martinrea had purchased the equipment from Pilot.

After briefly explaining how AQD operated, particularly focusing on permits, both permits to install, and renewable operating permits, I told her that without access to the district files at this time, it would be best to just inspect the facility.

Company operates 7 extruders for extruding plastic and rubber. Part of the rubber is extruded into tubes of about 2 " o.d. that are cut to length for short ,specific vehicle engine supply lines. The rubber tubes are coated with a Besting solution, a Flourodyn caulk, Viton(R)-based coating, and dried under small, dedicated exhaust hooding. Following the Besting solution application, the rubber tubes are prepared for curing by applying a small amount of glycerin and placed on a shaping mold. The tubes are then placed into one of 2 natural gas-fired curing ovens. One of the ovens is about 10 ft.x 10 ft. x15ft. in size, and is operated at about 364 deg. F. A smaller oven of about 4 ft. x 8 ft. x 4 ft. in size is operated at about 350 deg. F. The curing cycle lasts about 45 min. I was not able to find an ID tag indicating size or make.

Another portion of the rubber that is processed at the facility is extruded into longer rubber tubes, of less than 1 " o.d., which have a Tite-R-Bond (TM) adhesion Promoter applied and then are cured in oneof (2) natural gas-fired autoclaves operating at about 150 deg. F. I was able to read a barely legible name plate that indicated the autoclave was owned by Pilot Industries and was manufactured in 1968. One of the autoclaves was about 4 ft. in diameter and about 12 ft. long, while the larger autoclave was about 5 ft in diameter and 15 ft. long.

Company operates a heated polyethylene glycol dipping process, consisting of ten (10) hot glycol dipping tanks with in-plant ventilation for bending plastic tubes onto patterns for vehicle brake lines.

We went back to LaGrange's office to discuss my observations. I told her I would go back and look for the previous company's district file. Appears is was Pilot Industries. The process equipment observed today may already have permits or exemptions with the former company before Martinrea purchased the property.

My search for the previous company file, presumably Pilot Industries was not successful. I found out that the previous owner of the property was Johnson Controls (B-3658), Plastics Machinery Division, however, the file for Johnson Controls had permits for other equipment different from what I observed at this building now owned by Martinrea.

I called LaGrange back to tell her that I couldn't find a file for Pilot Industries at the location where Martinrea is now situated. I told her we had a file for Johnson Controls at this location, but that all of the equipment was different. Also, that AQD had a file for a previous location for Pilot Industries at another location in Manchester that made fuel lines, but that facility had permanently closed sometime before 2009.

LaGrange said she has only been at facility for a couple of years and has no AQD-related file for the company that Martinrea purchased, perhaps around 2006. She indicated they have all sorts of packaged files in storage within the building that have not been examined perhaps related to this previous equipment. She thought the rubber curing ovens and autoclaves had, perhaps, come from a Pilot Industries facility previously located near Clare. I told her I would try to track down any files on such a facility near Clare, but that I also would need to inspect her facility again to more completely evaluate the permit status of all of the equipment.

I later spoke with Chris Hare, Saginaw District AQD supervisor, who was unable to find any file for Pilot Industries near Clare or anyone on staff that remembered such a facility.

NAME GLEN ERICKSON

DATE 3-20-14

SUPERVISOR 