

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

B365824566

FACILITY: MARTINREA INC		SRN / ID: B3658
LOCATION: 10501 M-52, MANCHESTER		DISTRICT: Jackson
CITY: MANCHESTER		COUNTY: WASHTENAW
CONTACT: Kristy LaGrange , Health & Safety Coordinator		ACTIVITY DATE: 02/06/2014
STAFF: Glen Erickson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Follow-up inspection to 1-31-14 inspection. No district file on this company or on supposed Pilot Industries which originally owned the rubber extrusion and curing process now at Martinrea facility. This process does not have a permit, nor a permit exemption, apparently. Will send VN.		
RESOLVED COMPLAINTS:		

Follow-up inspection with Kristy LaGrange to more completely evaluate the processes at this facility and whether they need to have PTIs or are permit-exempt, since I found no active district file that described the equipment Martinrea operates at this Bishop Circle Assembly plant. Last known occupant of this building was Johnson Controls, and all of the permits were voided when Johnson Controls left sometime prior to 2009. Last permit was voided in 2004.

I told LaGrange that I needed to inspect a couple of the processes that I inspected last week, to better understand whether they meet a permit exemption. She has not found any records of where the various pieces of process equipment came from, other than the anecdotal information suggesting Pilot Industries had the equipment at one or more other locations before being acquired by Martinrea and this equipment was then relocated to the Bishop Circle Assembly location, before or after Martinrea acquired Pilot Industries.

When I was at facility on 1-31-14 I drove around facility after my inspection and observed a large baghouse located outside the SE corner of the building near the loading dock area. I found what I think is a voided permit for this equipment, 244-90, issued to Johnson Controls. LaGrange indicated that she knew the equipment I was describing and took me to inspect it. The baghouse is no longer in operation and is not connected to any equipment within the building. Martinrea has never operated it. I told her this is the baghouse with HEPA filter that Johnson Controls used to collect metal polishing particles that contained small amounts of beryllium in their manufacturing of custom plastic molding machinery.

Next we went back to the ten (10) hot, polypropylene glycol dipping processes used to set a plastic-cored rubber tube to a patterned template to fit a particular vehicle brake line configuration. It was estimated that the dipping tanks operated at about 150 deg. F. LaGrange said that the nylon plastic core would not set to the pattern permanently if they only used hot water, but using the high molecular weight polyethylene glycol as a heat transfer fluid made the parts take the template set permanently. There is minimal volatilization of this material since its boiling point is 480 deg. F. Most of the glycol loss that needs to be made up with fresh glycol comes from drip pads and wastewater.

This glycol dipping process appears to comply with the permit exemption Rule 286(d): plastic thermoforming equipment.

The Besting solution (Fluorodyn caulk) and the white bond agent (Tite-R-Bond(TM) Adhesion Promoter) coating processes both appear to comply with the provisions of permit exemption Rule 287(c).

The seven (7) extruders which extruder "plastic" are permit exempt while they extrude the "plastic" materials as described in Rule 286(a).

When the seven (7) extruders are extruding "rubber", followed by oven/autoclave curing, they do not comply with the permit exemption as described in Rule 286(a). It is conceivable that they could be covered by a Rule 290 exemption demonstration, but it would be complicated.

I advised LaGrange that I would be sending her a VN covering the rubber extruding and curing operations, and that she may want to seek assistance from an air quality consultant. I directed to the EAD list of air quality consultants on the AQD website.

NAME GLEN ERIKSON

DATE 3-20-14

SUPERVISOR sw