

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

B602744482

FACILITY: Inteva Products Adrian Operations		SRN / ID: B6027
LOCATION: 1450 E. BEECHER ST, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: Duke Couch , Environmental, Health, & Safety Manager		ACTIVITY DATE: 05/17/2018
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Inspection of a auto parts coating facility.		
RESOLVED COMPLAINTS:		

Major / ROP Source. Full Compliance Evaluation (FCE) and Inspection (PCE) of Inteva Products LLC - Adrian, located at 1450 E. Beecher St., Adrian, Michigan 49221.

Facility Contacts:

Duke Couch (DC), Environmental, Health & Safety Manager
dcouch@intevaproducts.com ph 937-267-1900

Purpose

On May 17, 2018, I conducted an unannounced compliance inspection of the Inteva Products LLC – Adrian (IP) facility located in Adrian, Michigan (Lenawee County) at 1450 E. Beecher Street. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules, and the conditions of IP's Renewable Operating Permit (ROP) number MI-ROP-B6027-2018, issued April 17, 2018. This facility was last inspected on February 2, 2016 and found to be in compliance.

Facility Location

The facility is located within the city limits of Adrian. It is immediately surrounded by other commercial / industrial sources. See attached aerial photo.

Arrival & Facility Contacts

Visible emissions or odors were not observed upon my approach to the facility via Beecher Street. I arrived at approximately 9:00 am, proceeded to the facility office to request access for an inspection, provided my identification, and asked if DC was available. I viewed a safety training video and was then escorted by DC to his office. (Note: Photos aren't allowed to be taken at this facility.) I informed DC of my intent to conduct a facility inspection and to review the various records required by their permit. DC extended his full cooperation during the inspection, accompanied me during the full duration of the inspection, and fully addressed my onsite questions.

Facility Background

IP mainly manufacturers instrument panels for General Motors vehicles. IP currently employs about 416 persons and operates 24 hours a day, 5 days a week. The main production operations at the facility include plastic injection molding and instrument panel assembly. The facility operates four automated spray paint lines (EU-P5, EU-Paint 1, EU-Paint 2, and EU-Paint 3) which are equipped with water-wash systems, robotic spray paint booths, and natural gas dryer ovens. EU-Paint 1 is IP's most advanced coating line and is also equipped with additional air pollution control equipment, including a rotary carbon concentrator and a regenerative thermal oxidizer (RTO). A third paint booth (EU-CKIP#2) is used for more small-scale painting activities, such as for small-scale service part orders. There are additional EUs that are incorporated in IP's ROP that operate under specific permit to install (PTI) exemptions (Rule 280 through Rule 290).

Plastic pellets are delivered and transferred to the facility's storage tanks. The pellets are sent through a drying process before utilization in the facility's injection molding machines. Several additional onsite emission units, not incorporated in IP's ROP, are exempt from the requirement to obtain a PTI and are described below.

The IP 2017 Michigan Air Emissions Reporting System (MAERS) reported the following VOC emissions for the following, non-exempt emission units (EUs):

29.3 tons for EU-P5 (emission limit: 55 tons per year (tpy)),
 0.2 tons for EU CKIP#2 (emission limit: 54.4 tpy),
 22.96 tons for EU-Paint 1 (emission limit: 40 tpy), and
 2.3 tons for EU-Paint 2 (emission limit: 39.5 tpy).

IP's ROP does not specify facility-wide VOC limits, but instead stipulates emission unit-specific VOC limits.

Regulatory Applicability

The facility is a Major / ROP source for volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions. The facility is regulated by ROP number MI-ROP-B6027-2018, and is also subject to Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products and to Title 40 of CFR, Part 63, Subpart A, NESHAP General Provisions. Compliance determinations were not made regarding both NESHAP standards although review of required compliance reports shows that they easily meet the standard of 0.16 pounds of HAPs per pound of coating solids in 2017. The facility reports its emissions to MAERS and is designated as a Fee Category I source. **(Note: As discovered during the inspection, the facility is subject to the RICE MACT 40 CFR Part 63 Subpart ZZZZ. Also, the Cleaver Brooks boilers are not subject to the Boiler MACT as they meet an exemption related to Winter use only.)**

Pre-Inspection Meeting

The pre-inspection began with a background summary of IP, which was provided by DC.

I asked whether IP experienced any recent issues or changes facility wide or with any of their APC equipment. DC replied that the RTO is currently being bypassed (as allowed by the ROP) and has not been operated since December 2016. He indicated that it is unlikely that they will need to restart it again going forward as they can meet their VOC limit of 40 tons per year without it. He estimated that it would take about one month to get it operational again as it has been winterized with all the activated carbon removed from the carbon concentrator. He said he monitors the VOC rolling average and stated that if it gets to 32 tons that would be the signal to restart the RTO. It is currently in the 16-ton VOC range.

I provided him with a records request sheet to conclude the meeting.

Onsite Inspection Narrative

EU-ADHCT-North and EU-ADHCT-South

EU-ADHCT-North and EU-ADHCT-South, which operate under a Rule 290 exemption, and includes application of an adhesive (consisting of polyurethane and isocyanate) to a plastic instrument panel substrate. It is then heated / thermoformed (EU-Thermoforming) to join the "foam skin" to the instrument panel substrate. The final product is also described to as a hand-wrapped instrument panel. (Not inspected). These two emission units are combined into a single reporting group in MAERS with 507.5 pounds of VOC reported in 2017.

Rule 201/ROP Exempt Processes Not inspected.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
<u>EU-MISC-HEATERS</u>	Miscellaneous Direct Fired Gas Space Heaters < 10 MMBTU/hour	<u>Rule 282(2)(b)(i)</u>	<u>Rule 212(4)(c)</u>
<u>EU-BOILER#35-1</u>	Cleaver Brooks natural gas fire boiler A-35-1. 14.645 mmBTU/hour	<u>Rule 282(2)(b)(i)</u>	<u>Rule 212(4)(c)</u>
<u>EU-BOILER#15-2</u>	Cleaver Brooks natural gas fire boiler A-15-2. 6.2775 mmBTU/hour	<u>Rule 282(2)(b)(i)</u>	<u>Rule 212(4)(c)</u>

EU-P5

EU-P5 is a coating line consisting of a water wash spray booth with six robotic applicators, a natural gas-fired flash oven (used to flash off carrier solvents and begins the pre-curing process), and a natural gas-fired curing oven. This spray booth employs a downdraft system, with clean air supplied from the ceiling and is drawn out from the floor. The airstream goes through the water wash stream before being discharged to the atmosphere via the stack. No odors were noted outside the booths. The oven was operating between 194 and 202 degrees F.

EU-Paint 3

EU-Paint is an instrument panel coating line consisting of one automatic spray dry filter booth and one natural gas-fired bake oven. It was not operating during the inspection.

EU-Paint 1

EU-Paint 1 is an instrument panel paint system consisting of a robotic flame treatment system, two robotic paint booths (No. 1 and 2), followed by a flash-off tunnel (No. 1), and then followed by a natural-gas fired paint bake oven. Each booth is equipped with a water-wash system to control particulate overspray. VOC emissions are controlled by a RCC and RTO, except during RTO by-pass mode.

I observed the bake oven temperature reading of 175 degrees Fahrenheit, which is below the limit of 194 degrees Fahrenheit imposed by SC IV.9. SC III.4 requires the facility implement a malfunction abatement plant (MAP). It was reviewed and found acceptable when it was submitted to the DEQ on February 2017. I observed the water wash system in operation, as required by SC IV.1.

The RTO was not operating and is not expected to be restarted. Going forward, based on expected product lines, VOC usage will continue to decline. The RTO and carbon concentrator appear to be only in fair shape. While in by-pass mode, emissions were being ducted via SV-Stack 28 which is 110 feet tall versus the 30-foot RTO stack.

EU-Paint 2

EU-Paint 2 is an instrument panel paint system consisting of a robotic flame treatment system, two robotic paint booths (Nos. 3 and 4), followed by a flash-off tunnel (No. 2), and then followed by a natural-gas fired paint bake oven (which is shared with EU-Paint 1). Each booth is equipped with a water-wash system to control particulate overspray. EU-Paint 2 was not in operation during the site tour, but I did observe the water-wash system in place, as required by SC IV.1. Water based coatings are used in the emission unit.

The part pathway through EU-Paint 1 and EU-Paint 2 is as follows: parts enter booths 1 and 2, then proceed through flash-off tunnel 1, then through booths 3 and 4, then they proceed through flash-off tunnel 2, and finally through the drying oven. Booths 1 and 2 are controlled by an RTO with bypass capability. Booths 3 and 4 are not controlled for VOC and exhaust through a separate stack. The parts are either coated in booths 1 and 2 or booths 3 and 4.

EUCKIP-#2

EUCKIP-#2 is a paint system that consists of a manual paint booth and paint bake ovens. The booth was not operating at the time of the inspection. I did observe that the water-wash control was in place and that the channel overflow had sufficient coverage over the width of the booth back wall, per SC IV.1.

EU EastBth 013

Not operating and was not operated in 2017.

EU-CARP-PNT

EU-CARP-PNT is currently used to coat small-scale items using aerosol cans. In addition, usage records submitted by DC indicate that no coatings were sprayed for this EU during 2018.

FG-NonHalogen/ COLDCLEANERS

During the inspection, I observed a few, bucket sized cold cleaners with closed lids. The permit SCs associated

with this EU were not evaluated during this inspection.

EU-HandAdh

This EU includes the hand application of adhesive. Emissions are minimal.

Facility Wide Observations

Facility appears to be well maintained. A roof inspection was also conducted. All required stacks were present and stack dimensions were estimated to be correct. No fallout and no paint were noted. Some minor amounts of paint odor was detected coming from the Paint-5 stacks.

In addition, during the entire facility tour, I only observed waste material collected in closed materials, per permit requirements. Overall, IP appears to be practicing excellent facility housekeeping.

Post-Inspection Meeting

We returned to DC's office and held a brief post-inspection meeting. We were briefly joined by Plant Manager Mark Ellerbrock. During discussions, DC indicated that IP does have 2 diesel engines associated with firefighting equipment. I informed him that these engines are regulated by the RICE MACT. I requested additional information about these engines to see if there were any compliance issues. DC promised to provide information on the engines along with records requested during the pre-meeting by Monday, May 21, 2018. I informed them that I did not have any other immediate concerns at that time. I noted that with declining emissions expected going forward, the Company should consider applying for an opt-out permit prior to when their ROP is up for renewal. I thanked them for their cooperation and assistance and departed the facility at approximately 11:40 am.

Recordkeeping Review

EU-P5 VI. MONITORING/RECORDKEEPING Conditions 3-4. All required records for March 2018. See Attachment (1). Limit 55 tpy rolling. Actual 27.36 tpy as of April. **Shows compliance.**

EU-CKIP#2 VI. MONITORING/RECORDKEEPING Conditions 1-5. All required records for March 2018. See Attachment (1). Limit 54.5 tpy rolling. Actual 0 tpy as of April. **Shows compliance.**

EU-Paint 1 VI. MONITORING/RECORDKEEPING Conditions 2, 3, 4, 5, 7. All records for March 2018. See Attachment (1). Limit 40 tpy rolling. Actual 22.36 tpy as of April. **Shows compliance.**

EU-Paint 2 VI. MONITORING/RECORDKEEPING Conditions 3 & 4. All records for March 2018.

See Attachment (1). Limit 39.5 tpy rolling. Actual 0 tpy as of April. **Shows compliance.**

EU-Paint 3 VI. MONITORING/RECORDKEEPING Conditions 2 & 4. All records for March 2018.

See Attachment (1) and (2). Limit 25 tpy rolling. Actual 2.99 tpy as of April. **Shows one area of non-compliance. Bake oven temperature not recorded between February 8th and April 18th, 2018.**

FG-RULE 287(2)(c) VI. MONITORING/RECORDKEEPING Conditions 1a. All records for March 2018 for each emission unit.

See Attachment (1). **Shows compliance.**

FG-RULE 290 VI. MONITORING/RECORDKEEPING Conditions 1. All records for March 2018.

See Attachment (1). **Shows compliance.**

IP also provided information on the 2 diesel engines that are used in their emergency fire suppression system that subject to the RICE MACT. It appears that the IP is in compliance with the requirements but needs to ensure this diesel engines are incorporated into their ROP at renewal. See Attachment (3). **Shows compliance.**

Compliance Summary

Based upon the visual observations and the review of the records, IP appears to be in substantial compliance

with the requirements of their ROP and PTI, except for the one item noted above in the **Recordkeeping Review** section. For EU-Paint 3, the bake oven temperature was not recorded between February 8th to April 18th and the Company plans to report this in their ROP semi-annual deviation report. Based on the inspection which showed the bake oven set point to be below the 194 degree permit limitation, bake temperatures for the rest of 2018 showing compliance and the fact that this data recording problem had already been resolved prior to the inspection, no Violation Notice will be sent.

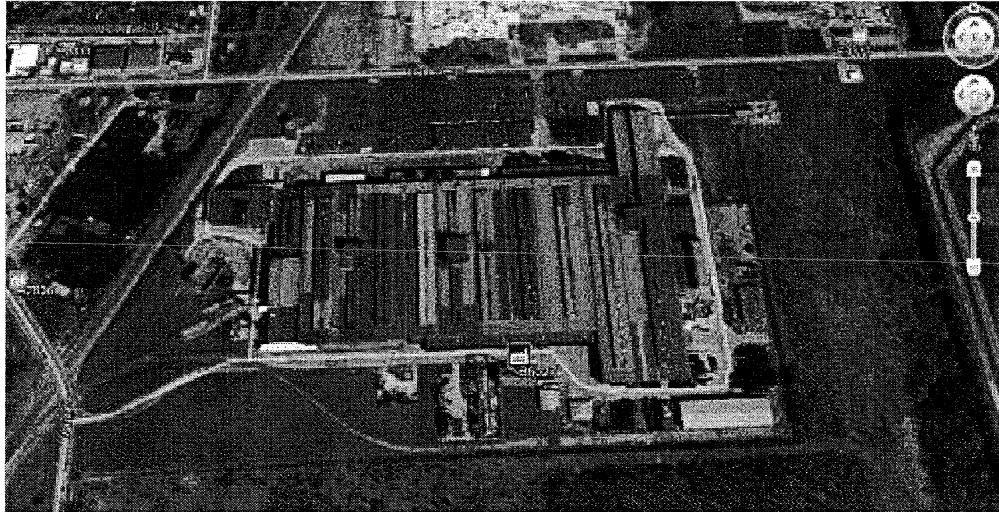


Image 1(Aerial photo) : Aerial photo

NAME M. Kowalchuk

DATE 5/25/2018

SUPERVISOR [Signature]