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

B756428568

FACILITY: The Tapco Group		SRN / ID: B7564
LOCATION: 4057 S OAK ST, METAMORA		DISTRICT: Lansing
CITY: METAMORA		COUNTY: LAPEER
CONTACT: Sue Aikin , Safety Coordinator		ACTIVITY DATE: 02/17/2015
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of facility which was last inspected in 2010, when it was owned/operated by Metamora Products.		
RESOLVED COMPLAINTS:		

On 2/17/2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a scheduled inspection of The Tapco Group's Metamora facility.

Environmental contact:

Sue Aikin, Safety Coordinator; 248-668-7931, Sue_Aikin@tapcoint.com

Facility description:

The Tapco Group's Metamora facility produces plastic shutters and vent trim.

Emission units:

Emission unit	Permit to Install No.	Relevant Michigan Air Pollution Control Rules	Operating status, at time of inspection
17 plastic injection molding lines	540-92	NA	Compliance
Newer plastic injection molding lines	NA	286(b)	Compliance
Plastic extrusion line	NA	286(a)	Compliance
Plastic compression line	NA	286(b)	Compliance
8 silos for storing plastic pellets	NA	286(b)	Compliance
Die making room, metal working processes	NA	285(l)(vi)(B)	Compliance
Tool room; metal working processes	NA	285(l)(vi)(A) or (B)	Compliance
Existing (prior to 7/1/1979) or new (on or after 7/1/1979) cold cleaner(s) using Safety-Kleen Premium Solvent (Virgin and Recycled)	NA	285(r)(iv); 611 or 707	Did not observe during inspection

Regulatory overview:

This facility is flagged in MACES as a minor source, although no specific pollutant is identified. Plastic injection molding facilities generally have very low actual emissions of volatile organic compounds (VOCs), the primary pollutant likely to be emitted, and potential to emit (PTE) is generally considered to be low, as well. AQD will ask the facility to estimate PTE.

Fee status:

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III. The facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

Location:

The facility is located 200 feet south of the main intersection in the town of Metamora. It is surrounded by commercial and residential buildings.

Recent history:

This facility was once owned and operated by Metamora Products, but was purchased by Headwaters Inc., in recent years, and is part of The Tapco Group. The equipment in the plant has remained the same, since the purchase by Headwaters, Inc. There are no air pollution complaints in the AQD file for this facility, going back as far as 1992. Older files are archived at the State of Michigan record center, but I determined that any further review of files was unnecessary.

Arrival:

I arrived at 9:57 AM. The date and time for this inspection was prearranged, as facility staff had not been available when I made an unannounced visit on 1/29/2015. I detected neither odors or visible emissions from the plant. Weather conditions were partly sunny and 9 degrees F, with winds out of the south.

I met with Ms. Susan Aikin, Safety Coordinator, who had come from the Tapco Group Corporate Offices in Wixom, to meet me at the plant site. Per AQD procedures, I presented my identification/credentials, and provided a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*.

Recordkeeping:

PTI No. 540-92 requires that the company record raw material usage, and that the facility keep VOC content records of their raw materials. It is my understanding that the facility keeps production records, and that they keep Material Safety Data Sheets in hard copy form, as well as electronically.

Plastic injection molding facilities generally have very low actual VOC emissions, as well as low potential VOC emissions. I asked Ms. Aikin for an estimate on the most recent yearly throughput, and for an estimate of the maximum throughput the facility could achieve, if it ran 24 hours per days, every day of the year. It should be possible to utilize an emission factor from either MAERS or AP-42 for VOC emissions from injection molding of plastic to estimate yearly emissions, as well as the PTE, to verify that this facility is a true minor source.

Inspection:

PTI 540-92 covers 17 plastic injection molding machines, which range in size from 75 to 1,000 tons. After the issuance of this permit, the Rule 286(b) exemption for plastic injection molding machines became available, so every plastic injection processes added to this plant since that time can be considered exempt.

This facility makes numerous shutter and vent trim products, including their *Inspire* line of products. The *Inspire* line and almost all of their equipment has been unchanged since the 7/19/2010 AQD inspection. They have swapped out a few small plastic injection processes, though, replacing them with newer units. The installation of these replacement lines should qualify as exempt under the Rule 286(b) exemption.

The plant has a "small end," where smaller injection molding lines are located. The "large end" of the plant has the larger lines.

I could not see any visible emissions from any of their operating lines. Along with shutters and vent trim, I was shown a process for making plastic roofing tiles. It involves a plastic extrusion line, exempt under Rule 286(a), followed by a plastic compression line, exempt under Rule 286(b). I could not see any visible emissions from the process, as it ran.

The 8 plastic storage silos are filled with plastic pellets, which are delivered by truck. There is a digital leveling system, to prevent overfilling, according to the 7/19/2010 inspection activity report.

They have a plastic shredder for recycling plastic sprues/runners, or quality control rejected parts. Cardboard and even plastic shrink wrap material is recycled.

The plastic injection molding machines appeared to be maintained in good condition. I was informed that they have a computerized preventative maintenance schedule, for all the units.

They have a die-making room, with several Bridgeport vertical milling machines, and other metal working processes. These exhaust into the general, in plant environment, and therefore qualify for the Rule 285(l)(vi)(B) exemption. One process was being operated, and I observed no visible emissions from the process.

They have a tool room with a Bridgeport vertical milling machine and other metal working processes. These exhaust into the general in-plant environment, and can qualify for either the Rule 285(l)(vi)(A) exemption for metal working processes used on a non-production basis, or the Rule 285(l)(vi)(B) exemption for metal working processes which exhaust into the general, in-plant environment.

Note: On 3/12, some weeks after the inspection was conducted, I e-mailed Ms. Alkin to ask if there were any parts washers at the facility, and if so, what kind of cleaning solutions they might use. On 3/20/2015, she e-mailed to me a Material Safety Data Sheet (MSDS) for the only cleaning solution they use at the plant (please see attached). It is Safety-Kleen Premium Solvent (Virgin and Recycled). This appears to indicate that any part washing process at the plant is a cold cleaner.

Rule 103(aa) defines a cold cleaner as:

"Cold cleaner" means a tank containing organic solvent at a temperature below its boiling point which is used to spray, brush, flush, or immerse a metallic object for the purpose of cleaning or degreasing.

Parts washers can be exempted from the requirement of Rule 201 to obtain a Permit to Install by a number of exemptions. The most likely one to apply here is Rule 285(r)(iv) for a process used to clean metal, the emissions from which exhaust only into the general, in-plant environment.

Although a cold cleaner may be exempt from needing to obtain an air use permit, Rule 611 (for cold cleaners installed prior to 7/1/1979) or Rule 707 (for cold cleaners installed on or after 7/1/1979) contain requirements for operational practices. On 3/24/2015I e-mail Ms. Aikin a copy of Rule 611 and 707. I will send, by U.S. mail, copies of the DEQ Cold Cleaner Operating Procedures stickers. These bright orange stickers contain written operational requirements for cold cleaners, and should be posted in an accessible, conspicuous location near the units, to help ensure compliance.

Conclusion:

I left the site at 11:04 AM. I could not find any instances of noncompliance, nor any areas of concern. The facility was very clean and orderly, and facility staff were very knowledgeable and professional.

NAME [signature] DATE 3/24/2015 SUPERVISOR [signature]