

H6303

Mawin

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

H630332335

FACILITY: INTEGRATED MANUFACTURING		SRN / ID: H6303
LOCATION: 6555 EAST DAVISON, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 11/18/2015
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: EUFOAMLIN		
RESOLVED COMPLAINTS:		

Integrated Manufacturing and Assembly Compliance Inspection Report

Date: November 18, 2015

Personnel Present:

Terseer Hemben, AQD

Mr. Patrick A. Topey, IMA EHS Supervisor

Mr. Dennis Karl, Environmental Consultant for IMA

Mr. Leon Montecinos, IMA, Plant Manager

Background

The Integrated Manufacturing and Assembly is a modeled polyfoam manufacturing company located at 6555 E. Davison, Detroit, Michigan. The facility produces molded polyurethane foam for automobile seat cushions. The plant operates a continuous multi-station, semi-automated line that conveys carrier mounted automobile seat cushion molds to a two robotic workstation where the polyurethane blend is put in the molds and the molds are closed. Finished cushion products are removed from the molds at manual workstations. Empty molds are cleaned and prepared for reuse by manual application of solvent based release wax using HVLP spray technology with good transfer efficiency. Additionally, there are 3 storage tanks (each 11,000 gallons), for polyol and 1 storage tank for toluene diisocyanate (11,000 gallons) as well as quality control laboratory.

Inspection Narrative

I arrived at the Integrated Manufacturing and Assembly facility at 1100 hours. The purpose of visit was to conduct a compliance inspection per FCE requirements. I was welcomed at the facility premises by Dennis Karl (Environmental Compliance Consultant for the IMA) and Patrick A. Topey (IMA EHS supervisor), and **Leon Montecinos (Plant Manager)**. We exchanged introductory information. I presented the purpose for the visit. The IMA team conducted me through the plant.

I observed the plant had been shut down. The power supply to equipment was disconnected. Many components of the plant units were removed from the site. Per regulatory conditions laid out in the ROP, I observed during the inspection:

In compliance: with emission & material Limits-The facility shall submit MAERS report in March 15 deadline that will account for the emission and material limits covering the reporting period consistent with Rule 702(a).

In compliance with Process/Operational Restrictions-The facility is set to submit MAERs report in March 15, 2016 deadline highlighting the capture of waste from mold release agent and quantified appropriately. The quantification of mold carriers per 12-months rolling time period determined at the end of each calendar month will be read from recordkeeping consistent with Rule 702. The EHS reported verbally that all wastes generated from mold release agents were captured and recycled or disposed through contractors for offsite management consistent with Rule 225.

In compliance with EUFOAMLIN- the line was shut down and componential units removed from site.

The robotic station was partially disassembled from the system line. The cushion molds were disassembled from the arms.

In compliance with HVLP transfer equipment: the equipment was disassembled from the reservoir. The spray nozzles were unscrewed from the discharge vessel. Power to the equipment was disconnected. The facility did not need to present the test caps for pressure testing consistent with Rule 702 (a).

In compliance with Polyol-the raw chemical material is usually stored in 3 vertical cylindrical tanks each holding 11,000 gallons of chemical. According to Patrick Topey, the polyol had been pumped and shipped out to another plant. The tank was filled with an inert liquid to maintain equilibrium with atmospheric pressure.

In compliance with Toluene diisocyanate –the chemical is stored in 1 vertical cylindrical tank of 11,000 gallons capacity. The chemical had been pumped and shipped out to another plant. The tank had been filled with an inert liquid for marinating pressure balance.

In compliance with chemical Laboratory-the facility operated a quality control laboratory in which analyses of raw materials and products were performed for quality assurance. The laboratory was closed. Equipment had been removed and shipped to another facility.

In compliance with the facility storage section-the facility had a section where essential materials and finished products were stored. The area was cleaned out of inventory. All materials had been shipped out to another facility. The entire area was cleaned out.

In compliance with Methylene Chloride emissions-the facility used equipment cleaner to flush out mixed head stream that contained methylene chloride or other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process consistent with 40 CFR 63.11417(c)(1)(i). The foam molding process was disassembled and removed from the facility. There was no need for use of the chemical or methylene chloride containing process. Hence there was no need for signing compliance certification by the Responsible official consistent with 40 CFR 63.11417(c)(1).

In compliance with Material Safety Data- the facility kept Material Safety Data Sheet for the molded foam line to demonstrate compliance with 40 CFR 63.11416 (c)(1) and (2) as delineated in SC.III.3 and SC.III.4 of the ROP (MI-ROP-H6303-2015). The facility did not need to show records for demonstration of compliance consistent with 40 CFR 63.11416(f) and 40 CFR 63.11417(d).

In compliance with testing- Facility did not need to verify emissions data owing to testing for VOC content, water content and density of any mold release agent as applied and received using federal method 24. The time elapse occurring between ROP and shut down was short. Hence, the facility is allowed to disregard this step but include in MAERS report. MAERS data shall highlight the emission characteristics.

In compliance with monitoring-MAERS report shall highlight the compliance in recordkeeping and emissions incurred from mold releases during the reporting period, calculations and reporting formats as required in SC. VI.1-SC. VI.4 consistent with Rule 702 , 802 and 40 CFR 52.21

In compliance with reporting-the facility is required to submit MAERS report for the period of operation events before the shut down, and shall include emissions incurred during start up and shut down in the period January 1, 2015 through December 31, 2015. The Environmental coordination/consultant for IMA, Dennis Karl assured the associated emissions incurred within the period will be reported in the MAERS report set for March 15, 2016.

In compliance with Stack/Vent Restrictions – Staff observed the stacks were standing tall and clean. No opacity was observed coming out of the 3 stacks.

In compliance with other requirements-the facility was required to comply with all applicable provisions of the NESHAP as specified in 40 CFR Part 63, Subpart OOOOOO for flexible Polyurethane Foam production and Fabrication as applied to EUFOAMLINe. The facility shut down the EUFOAMLINe and disassembled the equipment discontinuing manufacture of Polyurethane.

Determination

The inspection of the IMA facility was performed. The inspection indicated the plant had been shut down for many months and equipment removed before notification was made to DEQ-AQD Detroit District office. Emission-wise, the IMA was found to be in compliance with the permit requirement. The facility submitted a written request to void the ROP and associated permit (Appendix A ; Appendix B). The DEQ-AQD approves the request after this inspection. The permit will be voided and paperwork commences for completion of the void process.

Appendix A

Request to Void ROP

The letter appended was sent to the DEQ-AQD as a request to void the IMA's MI-ROP-H6303-2015

Appendix .B

Dr. Hembent,

Thank you for walking the idled IMA Foam Plant in Detroit with Dennis Karl, Leon Montecinos and I on 11/18/2015. A copy of the attached letter requesting that MI-ROP-H6303-2015 be voided is attached and it was sent by certified mail on 11/24/15 to the address and person shown below. I can be reached by email at ptopey@lear.com or by phone at 248-670-5970.

ROP Letter To Void MI-ROP H6303-2015 Was Sent To:

Wilhemina McLemore

Michigan Dept. of Environmental Quality

Air Quality Division, MDEQ

3058 W. Grand Blvd., Suite 2-300

Detroit, MI 48202

Thanks,

Patrick A. Topey, CWCP

EHS Supervisor

Human Resources

Integrated Manufacturing & Assembly (IMA)

13000 Oakland Parkway

Highland Park, MI 48203

Ph#: 248-670-5970

NAME fl

DATE 12/2/15

SUPERVISOR JK