

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

M408625903

FACILITY: TOYOTA TECHNICAL CENTER USA		SRN / ID: M4086
LOCATION: 14655 JIB STREET, PLYMOUTH TWP		DISTRICT: Detroit
CITY: PLYMOUTH TWP		COUNTY: WAYNE
CONTACT: Kristen Baumia, Environmental Specialist		ACTIVITY DATE: 02/06/2014
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : February 6, 2014
 TIME OF INSPECTION : 9:30 am
 LEVEL OF INSPECTION : II
 NAICS CODE : 336399
 EPA POLLUTANT CLASS : VOC
 INSPECTED BY : Jill C. Zimmerman
 PERSONNEL PRESENT : Kristen Baumia
 FACILITY PHONE NUMBER : 734-995-5317
 FACILITY FAX NUMBER : 734-995-5854

FACILITY BACKGROUND

Toyota Technical Center fabricates prototype vehicles. The facility operates one shift per day, five days a week, and employs between 5 and 9 people. The facility has operates four spray paint booths as well as various machining and prototype building areas.

COMPLAINT/COMPLIANCE HISTORY

The facility was last inspected in 2011 and was found to be operating in compliance. No complaints have been received regarding this facility.

OUTSTANDING VNs

No Violation Notices (VN) have been issued regarding this facility.

PROCESS EQUIPMENT AND CONTROLS

Toyota Technical Center, U.S.A. builds prototype car parts and bodies. To fabricate a prototype car body, the facility welds together prestamped metal body parts in a welding line, seals the parts in a sealant booth for waterproofing and noise proofing purposes, primes and coats the parts in one of four spray booths, and cures the final product in a "GVT, Inc. Model No. MCSF-24" oven with a 1.2 MBTU/hour heat rating capacity. The three newer booths double with a curing oven. Filters were present in the booths. These filters are changes as needed, about once per year. The cure ovens are fueled by natural gas. The oldest oven is located next to a dedicated curing oven. Paint usage records and maintenance records are kept at each booth. The facility also has three CNC machines which fabricate miscellaneous model/buck car parts from REN modeling board. Four rapid prototype machines also produce miscellaneous car parts from powders and resins. In addition to the four spraybooths, sealant booth, three CNC machines, four rapid prototype machines, welding line, and curing oven, the company has a few spot welders, five milling machines, a lathe, a few grinders, and two parts washers. Each of the machines is equipped either with its own dust collector or a portable dust collector when necessary. All of the machines exhaust to the general plant environment. One of the parts washers uses tripropylene glycol methyl ether (TPM glycol ether) as a cleaning solvent. The MSDS sheet for this solvent indicates that it consists of 99% by weight TPM glycol ether. TPM glycol ether is not a HAP. The other parts washer uses Safety-Kleen Premium Gold Solvent which consists of 100% petroleum distillates (mineral spirits) by weight. Both parts washers

appeared to be operated in a satisfactory manner at the time of the inspection. The MSDS sheets for the solvents used in the parts washers are attached to this report.

INSPECTION NARRATIVE

I arrived at the facility at 9:30 am and met with Ms. Kristen Baumia. Ms. Baumia explained the process at this location, and helped to answer any questions that I had regarding the facility. I reviewed the paint usage records that are kept at each paint booth. These records were available for the past five years. Together, Ms. Baumia and I walked through the facility where Ms. Baumia explained the process.

APPLICABLE RULES/PERMIT CONDITIONS

This facility is currently operating under Permit To Install (PTI) 149-10 for a paint cure oven and PTI 204-01, which is a general permit for a coating line.

149-10

FG-FACILITY

- I. Emission Limits
 1. Records were reviewed which demonstrate that the facility is emitting less than 9 tpy individual HAPs.
 2. Records were reviewed which demonstrate that the facility is emitting less than 22.5 tpy aggregate HAPs.
- II. Material Limits -- NA
- III. Process/Operational Restrictions -- NA
- IV. Design/Equipment Parameters -- NA
- V. Testing/Sampling
Proper manufacturer's formulation data is maintained at the facility to demonstrate compliance.
- VI. Monitoring/Recordkeeping
 1. Records were completed through January 2014 during the onsite inspection, which shows compliance.
 2. Proper records were maintained onsite and reviewed during the onsite inspection.
- VII. Reporting -- NA
- VIII. Stack/Vent Restriction -- NA
- IX. Other Requirements -- NA

204-01

FG-COATING

- I Emission Limits
 1. Records reviewed during the onsite inspection show that the facility emits less than 2000 pounds of VOCs per calendar month. In January 2014 the facility emitted less than 200 pounds of VOCs.
 2. Records indicate that during 2013, the facility emitted less than 2 tons of VOCs, which is less than the permitted limit.
- II Material Limits -- NA
- III Process/Operational Restrictions
 1. All waste was properly handled, stored and disposed.
- IV Design/Equipment Parameters
 1. Proper spray applicators are used for coating.
 2. Filters were present during the onsite inspection
 3. NA
 4. NA
 5. NA
- V Testing/Sampling

- 1. NA
- VI Monitoring/Recordkeeping
 - 1. NA
 - 2. NA
 - 3. All usage records and VOC records are maintained and were reviewed during the onsite inspection
 - 4. All MSDS were available for review during the onsite inspection.
 - 5. NA
 - 6. NA
 - 7. NA
- VII Reporting -- NA
- VIII Stack/Vent Restriction
 - 1. All stacks have been installed at the minimum height required by the permit.
- IX Other Requirements
 - 1. No equipment has been modified since the permit was issued.

FG-SOURCE

- I. Emission Limits
 - 1. During 2013 the facility emitted less than 1 ton of VOCs.
- II. Material Limits -- NA
- III. Process/Operational Restrictions -- NA
- IV. Design/Equipment Parameters -- NA
- V. Testing/Sampling -- NA
- VI. Monitoring/Recordkeeping
 - 1. Proper records were reviewed during the onsite inspection.
- VII. Reporting -- NA
- VIII. Stack/Vent Restriction -- NA
- IX. Other Requirements -- NA

MAERS REPORT REVIEW

MAERS for reporting year 2013 was received on February 21, 2014 and was reviewed on March 20, 2014. All emissions appear to have been accurately reported.

FINAL COMPLIANCE DETERMINATION

Toyota Technical Center appears to be operating in compliance with all state and federal regulations as well as all permit conditions.

NAME Joc ZimmermanDATE 7/11/14SUPERVISOR W.M.

