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

MA08643098

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FACILITY: TOYOTA TECHNICAL CENTER USA		SRN / ID: M4086
LOCATION: 14655 JIB STREET, PLYMOUTH TWP		DISTRICT: Detroit
CITY: PLYMOUTH TWP		COUNTY: WAYNE
CONTACT: Patrick Sickon , Environmental Manager		ACTIVITY DATE: 01/19/2018
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION

January 19, 2018

TIME OF INSPECTION

1:30 pm 336399

NAICS CODE EPA POLLUTANT CLASS

VOC

INSPECTED BY

Jill C. Zimmerman

PERSONNEL PRESENT

FACILITY PHONE NUMBER : 734-995-5317 734-995-5854

FACILITY BACKGROUND

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

COMPLAINT/COMPLIANCE HISTORY

The facility was last inspected in 2014 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. built prototype car parts and bodies. To fabricate a prototype car body, the facility welded together prestamped metal body parts in a welding line, sealed the parts in a sealant booth for waterproofing and noise proofing purposes, primed and coated the parts in one of four spray booths, and cured the final product in a cure oven.

INSPECTION NARRATIVE

I arrived at the facility at 1:30 pm. The parking lot was completely empty. I drove around to the back of the facility, which was also empty. The fenced area contained the dumpster was empty. I tried to enter the building. The door to the vestibule was opened, but the next door was locked with a doorbell. I rang the doorbell, but there was no answer. I looked in the window, and the workspace appeared vacant, though the lights were on.

On Monday January 22, 2018 at 2:30 pm I again attempted to enter the facility to complete my inspection. Again the parking lot was vacant.

On Tuesday January 23, 2018 I sent Mr. Patrick Sickon, Environmental Manager, an email to gain more information about the facility at this location. Mr. Sickon was the most recently listed contact person in the 2016 MAERS. A phone discussion followed. Mr. Sickon explained that the operations of this facility had relocated to a facility in York Township, near Saline

around February 2017. The paint booths are still located at this facility and are still operational. Occasionally, a third-party company, Kelty, uses the space and one paint booth for some overflow work. This facility uses about a quart of paint at a time.

Mr. Sickon asked if it was possible to void out the permits since the equipment is not used much. I explained that because there were multiple paint booths, the potential to emit would exceed the permit exemption levels, which is why the facility currently has an opt-out permit.

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. Toyota has not used this equipment since about February 2017. Occasionally, the equipment is used by a third party facility for overflow work. Since the equipment is currently not operating, I did not evaluate the permit conditions.

I was unable to meet with the third party who also uses the coating equipment. During the next fiscal year, I will meet with the third-party company to determine compliance with all permit conditions. Toyota Technical Center is responsible to show compliance with all permit conditions, regardless of who is operating the equipment.

MAERS REPORT REVIEW

MAERS for reporting year 2016 was received on March 10, 2017 and was reviewed on March 13, 2017. All emissions appear to have been accurately reported. During my conversation with Mr. Sickon, I reminded him that the facility would need to submit MAERS because the facility operating during 2017 and is still being used by a third party company.

FINAL COMPLIANCE DETERMINATION

Toyota Technical Center appears to be operating in compliance with all state and federal regulations as well as all permit conditions. Toyota no longer operates at this location. The facility still maintains the equipment at this location, and occasionally allow a third party to use the paint booth as needed.