

Plant

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

N066734066

FACILITY: JCI Lakewood Facility		SRN / ID: N0667
LOCATION: 205 Douglas Ave., HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Paul Brown , Technical Manager		ACTIVITY DATE: 04/01/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Paul Brown, Technical Manager. Mr. Brown was presented with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed. The last correspondence between the Air Quality Division (AQD) and this facility was in December of 2007, when the facility representative requested that the permit be voided. Since then, operations have changed slightly, with the addition of equipment related to the manufacture of automotive seating track assembly's.

FACILITY DESCRIPTION/COMPLIANCE EVALUATION

This facility consists of two buildings, which are considered one stationary source. Operations in Plant #1 consist of the manufacture of track assemblies for front automotive seats. Operations in Plant #2 consist of the manufacture of track assemblies for second and third row automotive seating. This source is currently operating pursuant to permit exemptions.

Plant #1 consists of various welding, roll forming and assembly operations. Welding operations are exempt from permitting pursuant to Rule 285(i). Each welding cell is controlled by a internally vented particulate collector. Based on the slight haze in the plant, there are some particulate that is not being collected. The facility uses a lead free solder. Roll forming is exempt from permitting pursuant to Rule 285(l)(i). Also present is a portable cold cleaner exempt from permitting pursuant to Rule 285(r)(iv). The facility has a small natural gas fired emergency reciprocating internal combustion engine. I recommend for completeness that the facility check to see if there are any RICE MACT requirements, and we talked about the EPA tool for that purpose. Requirements are unlikely, due to the age and small size. The facility also conducts various levels of cardboard and plastics recycling.

Plant #2 consists of much of the same operations, utilizing the same exemptions.

It is recommended that JCI Lakewood Facility, conduct an emissions evaluation, also known as a Potential to Emit demonstration. During the inspection we discussed the amount of wire being used in the welding at the facility. We met with Maria Weygandt, who helped find information on the weld wire usage. The current usage was provided based on the Form R report, and it does not appear to be a level of emissions that would need further regulation. However, the facility should have a more formal idea of what the criteria pollutant emissions are currently at this facility.

COMPLIANCE SUMMARY

Johnson Controls Lakewood Facility was in compliance at the time of the inspection.

NAME April Lazzaro

DATE 4-5-16

SUPERVISOR PPB