

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

N099032318

FACILITY: Dakkota Lighting Technologies		SRN / ID: N0990
LOCATION: 480 E. Second Street, ROCHESTER		DISTRICT: Southeast Michigan
CITY: ROCHESTER		COUNTY: OAKLAND
CONTACT: Daniel Stoscup , Environmental Health and Safety Coordinator		ACTIVITY DATE: 11/18/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On November 18, 2015, I conducted a level 2 target inspection at Dakkota Lighting Technologies, LLC located at 480 E. Second St., Rochester, Michigan 48307. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules, and the facility's Permit to Install No. 206-04. I pre-announced the inspection to my facility contact, Mr. Daniel Stoscup, since his office is in another location and to make sure he is in town to meet me at the facility. During the pre-inspection meeting, I initially showed my credential (ID Badge), stated the purpose of my visit, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities".

During the inspection, I was accompanied by Mr. Stoscup, Environmental Health and Safety Coordinator for Dakkota Integrated Systems and Dakkota Lighting Technologies. This facility was formerly known as Excel Decorating and Finishing, Inc. before Dakkota bought the assets from Plastomer Lighting Technologies (PLT) who initially bought the assets from Excel Decorating and Finishing, Inc.

The facility coated interior plastic parts for the automotive industry and conducted small scale manufacturing and assembly of automotive interior plastic components. The building was sectioned into 3 rooms: front assembly, front coating room, and rear injection molding and storage room. During the walk through inspection, Mr. Stoscup and I initially went to the coating room and observed Line 1, comprising of Spraybooths 1 & 2, operational but on standby. The filters were in place and appeared to be operating properly. Spraybooths 3 & 4 were not in use but filters were in place. Spraybooth 5 had been completely removed from the facility. The Chain-on-edge line was also removed a few years ago. Next, we proceeded to the rear section of the building. I observed 1 larger and 2 smaller injection molding machines near the entrance to the room. The larger machine produced plastic shifter vessels for certain types of vehicles. These shifter vessels were painted internally at the coating lines. The 2 smaller injection molding equipment produced the plastic components of an automotive interior light that lights up the dashboard in a vehicle. The rest of the rear area was storage space. The bulbs and other parts were brought in from an outside supplier and assembled in the front assembly area along with the plastic component produced from the 2 smaller injection molding equipment. A small pad printer in the assembly area printed labels into the parts such as serial numbers, etc. Laser equipment etched the "P, D, R, & N" letters in the shifter vessel in the assembly area.

PTI No.206-04 was issued to Excel Decorating and Finishing, Inc. as an Optout permit to install to make the facility a synthetic minor for Hazardous Air Pollutant (HAP) emissions. On June 27, 2014, Mr. Stoscup sent to AQD Warren Office the request letter for a facility name change to Dakkota Lighting Technologies, LLC. A copy was forwarded to AQD

Permits in Lansing, Michigan, to process the permit change.

During the November 18, 2015 inspection, I discussed with Mr. Stoscup the permit recordkeeping requirements for the monthly total VOC, individual and aggregate HAPs, and 12-month rolling totals for VOC, individual HAP, and aggregate HAPs as reported monthly. I requested for an electronic copy of the records which was sent to me the same day via email. Per PTI No. 206-04, special conditions FGFACILITY(2.1a & 2.1b), the most recently submitted spreadsheet showed monthly and 12-month rolling total individual and combined HAPs emissions data calculated from daily/monthly coating use records. As of October 2015, the highest individual monthly 12-month rolling total HAP emission occurred in February 2015 and showed 0.247 ton for Methyl Ethyl Ketone. This is less than the 8.9 tpy permit limit. The highest monthly 12-month rolling total for combined HAPs emissions occurred in February 2015 at 0.284 ton and less than the 22.25 tpy permit limit. Per PTI No. 206-04, special condition FG-PAINT-LINES(II), the FY 2015 highest monthly VOC emission rate occurred in April 2014 so far at 1,521.14 lb. or 0.76 ton and less than the 4.91 tons/month permit limit. The highest average lb./hr. occurred in October 2015 at 11.7 lb./hr. and less than the 28.3 lb./hr. permit limit. The highest monthly 12-month rolling total VOC emission rate occurred in October 2015 at 5.068 tons and less than the 58.9 tons/year permit limit. The monthly highest average VOC content occurred in August 2015 at 4.69 lb./gal. and less than the 5.0 lb./gal. permit limit. Per PTI No. 206-04, special condition FG-PAINT-LINES(V), the facility has spray booth filters in place and appeared to be operating properly.

On December 2, 2015, I received an email from Mr. Stoscup with an attached letter informing AQD that Dakkota Lighting Technologies will stop operating by December 20, 2015 and vacate the site by January 6, 2016. The site will be returned to Excel Decorating and Finishing owner who also owns the property.

Overall, I did not find any noncompliance issues during the inspection.

NAME

KMB

DATE

12/29/2015

SUPERVISOR

CJE