

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

N260447823

FACILITY: Cooper Standard		SRN / ID: N2604
LOCATION: 180 E. Elmwood, LEONARD		DISTRICT: Southeast Michigan
CITY: LEONARD		COUNTY: OAKLAND
CONTACT: David Malcolm , Plant Manager		ACTIVITY DATE: 02/04/2019
STAFF: Shamim Ahammod	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: conducted a scheduled inspection of ITT Automotive. The current name of the facility is Copper Standard, previously it was called ITT Automotive		
RESOLVED COMPLAINTS:		

On Monday, February 4, 2019, I, Shamim Ahammod, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff, conducted a scheduled inspection of ITT Automotive located at 180 E. Elmwood, Leonard, Michigan. The purpose of the inspection was to determine the company'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) and the Air Pollution Control Rules.

SOURCE DESCRIPTION:

The current name of the facility is Copper Standard, previously it was called ITT Automotive. Copper standard produces "quick connect" fittings for automotive and other applications. The facility had several PTIs. These were voided around 2005 because the facility appeared to be in compliance with all applicable requirements and all of the process equipment were exempt from the requirement to obtain a PTI, based on AQD staff field inspection on November 4, 2004. Currently, the facility has no PTI.

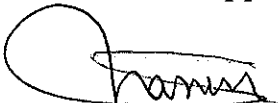
INSPECTION & REGULATORY ANALYSIS:

I arrived at the facility at approximately 1:00 PM, entered the Customer Service office and identified myself to a member of the office staff. This staff member introduced me to Mr. David Malcolm, Plant Manager, Copper Standard. I introduced myself to Mr. Malcom, showed him my credentials, provided him my visiting card and stated the purpose of the inspection. During the pre-inspection meeting, we discussed the previous voided permits reasons for voiding the permit and the purpose of my visit. After that, Mr. Malcolm and I toured the plant to get an idea of the overall operations at the facility.

At the time of inspection, I observed eighteen (18) plastic injection molding presses and eleven (11) high-speed assembly lines in the facility. These pieces of equipment appear to be exempt from R.336.1201 per R 336.1286(2)(b) to have a permit to install. Per R 336.1286(2)(b), Plastic injection, compression, and transfer molding equipment and associated plastic resin handling, storage, and drying equipment are exempt from having a permit to install.

According to Mr. Malcom, the maximum amount of plastic throughput is roughly 1900 lbs of plastic resin per 24-hour day. tons-inch. At the time of my inspection, I did not notice any visible emissions from the process. No coatings are used in the facility, according to Mr. Malcolm.

Based on the on-site inspection, and discussion with staff, the facility appears to be in compliance with the applicable Air Pollution Control Rules.

NAME 

DATE 02.13.19

SUPERVISOR SK