

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

N663024215

FACILITY: Toyada Gosei Fluid Systems USA Corporation	SRN / ID: N6630
LOCATION: 740 Advance Street, BRIGHTON	DISTRICT: Lansing
CITY: BRIGHTON	COUNTY: LIVINGSTON
CONTACT: Marlene S. Hardesty, PHR, CTT , Environmental, Health & Safety Manager	ACTIVITY DATE: 01/29/2014
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance
SUBJECT: Unannounced, scheduled inspection.	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

On 1/29/2014, the Air Quality Division (AQD) of the Department of Environmental Quality (DEQ) conducted an unannounced, scheduled inspection of Toyada Gosei Fluid Systems (TG Fluid Systems) USA Corporation, at their Brighton facility.

Facility environmental contact:

Marlene S. Hardesty, PHR, CTT, Environmental, Health & Safety Manager; 810-534-1103;
marlene.hardesty@tgggroupna.com

Facility description:

This facility assembles plastic extrusions, which were extruded at one of the company's other sites. The products made here are classified as "functional parts." They are primarily hoses and tubing, which are used as fuel tank modules parts, power train parts, and chassis and drive train parts.

Regulatory overview:

This facility operates assembly processes which are exempt from the requirement of Rule 201 of the Michigan Air Pollution Control Rules to obtain a permit to install, because they do not emit air contaminants.

Emission units:

This manufacturing facility has a number of work stations for assembling plastic tubing with plastic component parts. Prior to assembly, they may impart a bend to the plastic tubing, by heating it electrically.

Recent history:

At the time of the previous AQD inspection here, on 4/16/2009, this plant extruded plastics on site, to make hoses and tubing. The extrusion work is now being done at the company's Howell location (1055 Packard Street). The extrusions arrive here, at the Brighton plant (740 Advance Avenue), are assembled, and are then moved to the company's warehouse (747 Advance Avenue), directly across the street, to the south. In 2009, all of these functions had been done here, under one roof.

Location:

The facility is located in an industrial area, along Advance Street. To the west is undeveloped land, for at least 1,000 feet. To the south, is their warehouse, followed by other industries, for the first 1,000 feet. To the southwest, there is a residential street, about 500 feet away. There are commercial or possibly industrial facilities immediately north of the plant, and a large commercial facility about 500 feet northeast of the plant. To the east, there are industries for 1,000 feet, followed by commercial areas.

Arrival:

I arrived at 10:21 AM. I checked for any signs of particulate emissions, while standing to the east and south of the plant. I could barely make out what appeared to be steam, against a backdrop of white clouds. I detected a very brief plastic odor, while standing about 50 feet east of the plant. Weather conditions were partly sunny, 5-10 degrees F, and the wind was out of the west southwest. I did not detect the odor again, either inside or outside of the factory.

I met with Ms. Marlene S. Hardesty, PHR, CTT, Environmental, Health & Safety Manager. Per AQD procedure, I provided her with a copy of the DEQ brochure "Environmental Inspections: Rights and Responsibilities."

We reviewed the previous AQD inspection report, dated 4/16/2009. Ms. Hardesty spotted some errors, which suggested that the AQD inspector at the time may have confused the Brighton plant with a previous Brighton facility they had. They moved to the current site in 2004. The errors included work schedule at this plant, and number of employees. They have never been on four 10-hour workdays at this plant, contrary to the report, and in 2009 they had considerably more employees than the 160 mentioned in the report, although it would have been about right for the earlier location.

Inspection:

They have two departments here; manufacturing, and logistics (the receiving of raw materials, and shipping of finished products).

Ms. Hardesty showed me a work station where straight tubular extrusions from the Howell plant are heated enough to impart a slight bend to the tube. The heating is done electrically, and I was informed that there are no emissions from this process. A plastic fitting from one of their suppliers is then fitted to one end of the tube. This work station was typical of the other work stations they have at the plant.

Different kinds of plastics are used for the tubing and other components, depending on what the customer's needs are. The assembly of parts can either be done manually, or by machine. The plastic parts did not undergo any cutting, drilling, grinding, or sanding activities.

They have a small machine shop at the plant, where they make some aluminum formers, as needed. These metal working processes are used on a non-production basis, and therefore appear to satisfy the Rule 285(l)(vi)(A) exemption criteria. Additionally, they appeared to exhaust to the in-plant atmosphere, satisfying the Rule 285(l)(vi)(B) exemption criteria.

I could not smell plastic or any other odors, as we walked through the plant. The facility appeared to be clean, neat, and orderly.

Regarding the Toyada Gosei Fluid Systems extrusion plant, at 1055 Packard Street in Howell, Ms. Hardesty indicated if AQD staff go there to conduct an inspection in the future, she will try to meet us there, as quickly as possible. If she were to be unavailable, she indicated that the first shift has a plant manager who could assist us, and the second shift has a manufacturing manager. I provided Ms. Hardesty with a print out of the DEQ webpage for calculating Potential to Emit (PTE), so that could be done for the Howell plant, at some point in the future. Generally speaking, however, plastic extrusion facilities tend to have a PTE far below the major source threshold of 100 tons per year of Volatile Organic Compounds.

Conclusion:

Ms. Hardesty was very knowledgeable and professional. The facility appeared to be in compliance with the Air Pollution Control Rules of the State of Michigan. I could not identify any instances of noncompliance, nor any areas where I felt there needed to be improvement. I left the site at 11:20 AM.

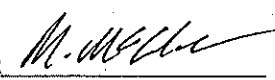
NAME



DATE

2/10/2014

SUPERVISOR



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