

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

FY 2014 Insp

P050124500

FACILITY: CHAMPION GASKET AND RUBBER, INC.	SRN / ID: P0501
LOCATION: 3225 HAGGERTY ROAD, WALLED LAKE	DISTRICT: Southeast Michigan
CITY: WALLED LAKE	COUNTY: OAKLAND
CONTACT: Nathan Dubuc, Vice President - Operations	ACTIVITY DATE: 02/19/2014
STAFF: Iranna Konanahalli <i>IB</i>	COMPLIANCE STATUS: Non Compliance
SUBJECT: FY 2014 self-initiated inspection of Champion Gasket & Rubber, Inc.	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

E-file: P0501-SAR-2014 02 19

Champion Gasket & Rubber, Inc. (P0501)
3225 Haggerty Road
P.O. Commerce Twp. (Plant: Walled Lake), Michigan 48390-1725

www.ChampionGasket.com

On February 19, 2014, I conducted a level 2 self-initiated inspection of Champion Gasket & Rubber, Inc. ("Champion") located at 3225 Haggerty Road, P.O.: Commerce Twp. (Plant: Walled Lake), Michigan 48390-1725.. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Nathan Dubuc (Phone: 248-624-6140; Cell: 248-921-3015; Fax: 248-624-3069; E-mail: Nathan@ChampionGasket.com), Vice President of Operations, assisted me.

Founded in 1970, Champion Gasket manufactures a complete array of die-cut products including gaskets, BSR pads, ant-rattle products, insulation, shims, seals, spacers, etc. serving automotive, marine, data communications, electronics, aerospace, appliance, etc. industries. The products are made of synthetic or natural rubbers.

Champion Gasket employs about 25 people.

There is no rubber compounding (vulcanization) is taking place. Hence, Champion does not emit sulfur-bearing odorous compounds due to sulfur of vulcanization. The additives, such as sulfur (S) modify the polymer by forming cross-links (bridges) between individual polymer chains.

Die-cut machines

There are numerous die-cut machines:

1. One Sunco 35 press that cuts rubber using cutting die.
2. Nine Thompson die-cut presses.
3. Seven Hydronic presses

The die-cut machines do not exhaust to outside ambient air. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

Cutters and laminators

Two Seybold cutters are present. One laminator that affixes adhesive paper to the rubber or polymer is present. Laminated material is cut to the desired shape and size. No exhaust to outside ambient air.

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 (l).

Laser cutting machine

One Universal laser cutting machine is present. The machine is used for prototyping work. The particulate laden air is exhausted to outside ambient air without an air pollution control equipment (APCD) via a stack.

AQD issued February 24, 2014, Violation Notice for failure to obtain a permit (Rule 336.1201).

Conclusion

AQD issued Rule 336.1201 (Rule 336.1285) Violation Notice dated February 24, 2014.

FYI: February 24, 2014, VN

February 24, 2014

Mr. Nathan Dubuc
Vice President - Operations
Champion Gasket and Rubber, Inc.
3225 Haggerty Road
Walled Lake, Michigan 48390-1725

SRN: P0501, Oakland (63) County

Dear Nathan Dubuc:

VIOLATION NOTICE

On February 19, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Champion Gasket and Rubber, Inc. ("Champion") located at 3225 Haggerty Road, Walled Lake, Michigan. The purpose of this inspection was to determine Champion'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 administrative rules.

During the February 19, 2014 inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Universal laser cutting machine	Rule 336.1201 (Permit -to-Install)	Champion Gasket and Rubber, Inc. ("Champion") installed the laser cutting

machine without obtaining a Permit-to-Install.^θ

^θ In lieu of obtaining Permit-to-Install according to Rule 336.1201 (Rule 201), Champion may install and operate properly appropriately designed and operated fabric filter or cartridge filter with pre-cleaning cyclone to protect filters from relatively large particles; large particles may cause wear and tear damage to the filter media upon impact due to their higher momentum. The filtered (and cleaned of particles) exhaust gases may be discharged in-plant environment or to outside ambient air like the existing set-up. These conditions are based upon Rule 336.1285(l)(vi).

During this inspection, it was noted that Champion had installed and commenced operation of an unpermitted process equipment, known as Universal laser cutting machine, at this facility. The AQD staff advised Champion on February 19, 2014 that this is a violation of Act 451, Rule 201.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

A permit application is not necessary if the conditions of Rule 336.1285(l)(vi) are satisfied as stated above.

Please initiate actions necessary to correct the cited and submit a written response to this Violation Notice by March 17, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Champion believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the cited above and for the cooperation that was extended to me during my inspection of Champion. If you have any questions regarding the or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,

Iranna Konanahalli

Air Quality Division
586-753-3741 or konanahallii@michigan.gov

ISK /DAC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ
Ms. Jenine Camilleri, DEQ

NAME J. S. Heremahall

DATE 03/13/2014

SUPERVISOR CTE