

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

ACTIVITY REPORT: Self Initiated Inspection

U50170002538130

FACILITY: CIE USA		SRN / ID: U501700025
LOCATION: 15004 23 Mile Road, Shelby		DISTRICT: Southeast Michigan
CITY: Shelby		COUNTY: MACOMB
CONTACT:		ACTIVITY DATE: 12/09/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Facility inspection and compliance determination.		
RESOLVED COMPLAINTS:		

Background

CIE USA Plant 4 (CIE P4) is a plastic part manufacturing facility located at 15004 23 Mile Rd, Shelby Charter Township, MI 48315. The facility inspected is one of five plants in the local area. CIE USA specifically manufactures thermal plastics parts for the automotive industry. CIE USA is located in a primarily industrial area with the nearest residential structures approximately 2000 feet away from of the facility. The facility was inspected on December 9, 2016 by Sam Liveson Environmental Engineer, and Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. CIE USA currently does not have a permit with the MDEQ AQD. The site contact is the Environmental Health and Safety Coordinator, Teresa Reinwasser. CIE USA has a total of 600 employees distributed amongst the five plant locations.

Inspection

Site arrival was at approximately 11:45 am, December 9, 2016. Upon arrival we were greeted by Environmental Health and Safety Coordinator Teresa Reinwasser and Human Resource Manager Karen Rabine. We presented our State of Michigan identification card, informed the facility representative of the intent of our inspection and were permitted onto the site. We conducted a brief introductory meeting to discuss background information on the facility and to learn about what processes the facility operates. They told us that the facility produces plastic components for the automotive industry. The process used is injection molding. Teresa provided me with a copy of the facilities exemption demonstration for the applicable equipment. This exemption demonstration included all five facilities, but I only analyzed the plant 4 information. Teresa did indicate that the five plant buildings all produced automotive plastics. CIE's exemption demonstration sheet indicated that plant 4's primary manufacturing equipment is 34 injection mold presses. After our meeting Teresa and Karen showed Sam and me the facility's production area.

Exempt Equipment

Storage containers

CIE P4 has five 60,000 lb capacity pellet storage silos. The silos are reportedly equipped with fabric filter particulate control or equivalence. I did not inspect the silos or the control equipment during my inspection. CIE reports the equipment as permit exempt pursuant to R 336.1284(k) which in part states ... Except as specified in R 336.1278, the requirement of R 336.1201(1) to obtain a permit to install does not apply to containers, reservoirs, or tanks used exclusively for any of the following: ... (k) Storage containers of noncarcinogenic solid material, including silos, which only emit particulate matter and which are controlled with an appropriately designed and operated fabric filter collector system or an equivalent control system. CIE's information appears to meet the permit exemption.

Press- Injection Molding

CIE has 34 injection molding presses at plant 4. Sam and I inspected the equipment during the facility walk through. The injection molding appears to meet permit exemption R 336.1286(b). Teresa informed us that the equipment did not use mold release on every part, but instead may use mold release during the initial start-

up of the equipment. The mold release is applied with hand held aerosol cans. The mold release appears to meet permit exemption R 336.1287(b). The hydraulic oil tank associated with each press appears to meet permit exemption R 336.1284.

Rule 286(b) in part states

... The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

...

... (b) Plastic injection, compression, and transfer molding equipment and associated plastic resin handling, storage, and drying equipment. ...

Rule 287(b) in part states

...The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

...(b) A surface coating process that uses only hand-held aerosol spray cans, including the puncturing and disposing of the spray cans....

Rule 284(c) in part states

...Except as specified in R 336.1278, the requirement of R 336.1201(1) to obtain a permit to install does not apply to containers, reservoirs, or tanks used exclusively for any of the following:

...(c) Storage and surge capacity of lubricating, hydraulic, and thermal oils and indirect heat transfer fluids...

Heating and Cooling

CIE has a reported seven roof furnaces with the highest heat input of 206,000 Btu per hour. This equipment appears to meet permit exemption R 336.1282(b)(i). Rule 282(b)(i) states that fuel burning equipment which is used for space heating and burns sweet natural gas with a heat input capacity less than 50,000,000 Btu per hour does not require a permit to install. CIE's also reports having indoor gas heating furnaces with heat outputs of 120,750 Btu per hour. These furnaces also appear to meet the Rule 282(b)(i) permit exemption. CIE reports having multiple air conditioning units at plant 4. CIE's comfort split AC electric cooling units are not used to ventilate air contaminants and appear to meet permit exemption 1280(b).

Conclusion

Based on the inspection and document review CIE USA appears to be in compliance the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. There are no apparent recommendations for this facility.

NAME



DATE

1/10/16

SUPERVISOR

SK