

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

A635238857

FACILITY: IACNA, Mendon, LLC		SRN / ID: A6352
LOCATION: 236 West Clark Street, MENDON		DISTRICT: Kalamazoo
CITY: MENDON		COUNTY: SAINT JOSEPH
CONTACT: Steve Brown , Human Resources Manager		ACTIVITY DATE: 03/08/2017
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. Steve Brown and Terry Thomas were the contact people for IAC. Dennis Dunlap was the inspector for AQD. The company employs 500 people and operates 3 shifts per day, five days per week. The primary product is plastic interior automotive parts for Chrysler and GM. The facility is covered by permit 133-05A which is a synthetic minor permit for VOCs and HAPs.

WALKTHROUGH

There is a vinyl fabric cutting machine that cuts the fabric into various sizes. This is exempt by Rule 285 (l)(vi)(B).

There is an enclosed booth that uses infrared heat to join plastic together. It operates at 400-600 degrees F. When operating some smoke is produced. The emissions go through a torit dust collector called a smoke eater inside the building before venting outside. This operation may be exempt by Rule 286(f) Plastic Welding or Rule 286(d) plastic thermoforming. This has been in operation for about 3 years.

The headliner operation (EURIMLINES) has been dismantled since about January. This had a permit limit of 11 tpy of VOC for the mold release.

There was a cold cleaner in the maintenance shop and one in the repair shop. Both had the lids closed.

There is a Chrysler door panel operation that sprays a two-part green adhesive (RT glue) on plastic parts in two booths in an upstairs area. The parts then go to an oven heated at 110 degrees F. The adhesive is an acrylic polymer Diversitak CI-6507A and a hardener CI-5608 BG. This is a Rule 290 group and monthly records are kept. The parts then move downstairs and are molded together with vinyl to form the door panel. This operation is exempt by Rule 286(d).

There are three bays containing a total of 36 plastic injection machines. Polypropylene and ABS plastic are used. The plastic is stored as pellets in five outside silos. The plastic injection machines and associated handling equipment is exempt by Rule 286(b).

There is an upstairs and down stairs seating foam line (EURIMSEATING). In this operation a water-based mold release is sprayed onto a mold. Foam is then sprayed into the mold. The foam consists of two components, MDI and a polyol, These react to form the foam. This reaction injection molding is exempt by Rule 286(e). Use of the water-based mold release was begun in Sept. 2016. Before that a mold release was used that contained 98% VOC. The MDI is stored in two 10,000 gallon tanks and the polyol is stored in one 6,000 gallon tank. The vapor pressure meets the exemption in Rule 284(l) for storage tanks.

The permit for EURIMSEATING was for VOC in the mold release. Since reaction injection molding is exempt by Rule 286(e), the upstairs line is not a violation as long as the VOC limit is met. Although the last inspection report did not mention an upstairs line, the present inspector is not sure if there was an upstairs line in the past.

The silk screen printing operation has been shut down since Sept. 2016. VOC emissions from this process were generally less than 100 pounds per month. It is exempt by Rule 287(e).

There is a diesel fire pump in a building out by Nottawa Road. This is an existing emergency RICE under 40 CFR Part 63 Subpart ZZZZ. It is 119 b.h.p. Since the facility is an area source AQD does not enforce

this. The requirements for this is to change oil and filter every 500 hours of operation or annually, whichever comes first, inspect the air cleaner every 1,000 hours or annually, whichever comes first and replace as necessary, and inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary. It appears that the facility does this. The fire pump has a 500 gallon diesel tank with containment. The engine is run weekly for 15 minutes.

RECORDS

The facility is keeping monthly usage, VOC, and HAP emission records. Based on the inspection the company updated the recordkeeping sheet which is in Excel, such as for the RT glue and individual HAPs.

For EURIMSEATING, the VOC limit of 49.7 tons based on a 12-month rolling time period was exceeded in March, 2016 at 50.27 tons. Since then the VOC emissions have decreased. A major reason for the decrease is a switch to a water-based mold release. A violation notice will not be sent on this.

For the RT glue Rule 290 group, VOC emissions were over-reported by a factor of ten. With the correction this emission unit is in compliance. VOC emissions are less than 100 pounds per month. The CI5608 BG was reported on a separate line. HDI (hexamethylene 1,6 diisocyanate) is a component of this and has a 0.2 screening level with a Rule 290 emission limit of 20 pounds per month. HDI is reported monthly in the HAP tracking sheet.

PF Bolster is another adhesive Rule 290 group. It uses Diversitak CI-6575A and CI-5608B. VOC emissions are less than 100 pounds per month. This process was not seen during the inspection. HDI is reported with the HAPs.

Although monthly emissions of individual HAPs are reported, a 12-month rolling time period recordkeeping needs to be added. This was done.

The facility-wide VOC and HAP emissions are well under the permit limits. VOC emissions include emissions from plastic injection molding, silk screen printing, adhesives, mold release, reaction injection molding, and hand-held aerosol cans (exempt by Rule 287(b))

Because the facility has switched to the water-based mold release, the permit requires Method 24 testing or sending a letter to the AQD to request the use of manufacturer's formulation data. This will be relayed to the company. The company has submitted this request. Based on the manufacturer data the VOC content of the new mold release is 0.806 lb/gal compared to 6.13 lb/gal for the old mold release.

NAME Dennis Dewlap

DATE 3/20/17

SUPERVISOR mm 3/20/2017