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

B284946100		
FACILITY: Ventra		SRN / ID: B2849
LOCATION: 3075 BRETON SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Maureen Lynch, Environmental Health & Safety Manager		ACTIVITY DATE: 09/06/2018
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, sche	eduled inspection.	
RESOLVED COMPLAINTS:		2

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Jack Turner, Plant Manager. The environmental contact, Maureen Lynch was currently out of the office, but would meet with us later.

FACILITY DESCRIPTION

This facility conducts the design and manufacture of plastic automotive exterior lighting assemblies. This location has around 1,000 employees with different areas working different schedules up to three shifts per day. There are currently no permits associated with this facility.

I explained to Mr. Turner that the AQD is conducting inspections state wide on facilities that are marked as conducting chrome electroplating in our system, and Ventra is one of those facilities. Mr. Turner stated that they no longer conduct chromium electroplating of any kind at this facility and have not in two years. The area where the plating had been conducted was observed, and the removal of equipment confirmed. I have removed this facility from the AQD fee's list as well as removed the chromium categorization from our system.

COMPLIANCE EVALUATION

Molding Operations

The plastic injection molding operations are varied based on the type of part being molded on one of the ~60 plastic injection machines. None of the molds use any type of mold release and are exempt per Rule 286.

Painting Operations

There are two painting operations currently operating at the facility. A third booth for the research and development lab has been partially installed, but completion of the project has been halted pending further internal approvals. The existing booths operate pursuant to Rule 287(2)(c), and the 200 gallon per month usage and monthly recordkeeping requirements were discussed.

The Pad Print operations are conducted in an enclosure. The part is loaded onto the mold and goes into the enclosure to have a thin line of coating sprayed on plastic. Examples of the recordkeeping is attached, as well as the SDS for the products used.

The limited use spray booth was observed, and logs of usage are maintained and attached. We discussed filter placement and the employee responsible for maintenance was aware of the requirements. A pressure drop gauge is used to monitor the pressure in the booth which is used as a filter replacement indicator.

Metalizing Process

Ventra conducts an aluminum to plastic metalizing process that is internally vented. Basically, parts are hung from a rack and placed into a chamber. A base coat is misted on the parts, and then the aluminum is vaporized and under vacuum it adheres to the charged part. Currently, there are five aluminum metalizing chambers at the facility. This process was previously determined to be exempt pursuant to Rule 290. However, since it is all conducted under vacuum and is not vented externally, there does not seem to be any air contaminants associated with the process and as such no additional records were requested. Information is in the file on a previous Rule 290 one time demonstration if needed.

Rack Strip Process

The facility operates a caustic strip line that utilizes sodium hydroxide and operates pursuant to the Rule 290 exemption. There have been no changes to the process and as such emissions of sodium hydroxide continue to meet the exemption. Usage and process information is attached to verify operational parameters.

In the rack strip room there is one bulk annealing oven that consists of 2 "sections". This is exempt per Rule 282.

Plastic Annealing

The plastic lighting assemblies are put in one of many plastic annealing ovens to strengthen the plastic as a unit. These annealing ovens have a maximum temperature of 170°F and are exempt per Rule 282.

Sonic Welding

There are a variety of plastic welding stations that utilize sonic energy to weld the plastic parts together. These operations are exempt per Rule 285.

Parts Washer

One parts washer is located in the tool room and one in the pad printing enclosure and both are maintained by Crystal-Clean and exempt per Rule 281.

SUMMARY

Ventra was in compliance at the time of the inspection.

DATE 9-18-18

SUPERVISOR