

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

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| FACILITY: MARTINREA INC | | SRN / ID: B3658 |
| LOCATION: 10501 M-52, MANCHESTER | | DISTRICT: Jackson |
| CITY: MANCHESTER | | COUNTY: WASHTENAW |
| CONTACT: Amanda Dumond , Health and Safety Coordinator | | ACTIVITY DATE: 02/10/2016 |
| STAFF: Zachary Durham | COMPLIANCE STATUS: Compliance | SOURCE CLASS: Syn Minor Opt Out |
| SUBJECT: Unannounced, self-initiated inspection of facilities and equipment in PTI 61-14. Follow up visit on 3/24/16 with Amanda Dumond. | | |
| RESOLVED COMPLAINTS: | | |

Contacts

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Purpose

This was an unannounced, self-initiated inspection of Permit to Install (PTI) 61-14 for rubber extrusion processes and equipment at the Manchester, MI location. I arrived at the plant at about 2:45pm and requested to meet with Kristy Lagrange, whom was the contact listed in AQD files. Kristy has since left the company, so I met with Chelsea Roumell and Donna Yelinek instead.

Background

This facility was formerly the site of a Johnson Controls manufacturing plant, which held several permits and are identified in the previous inspection conducted by Glen Erickson. The inspection dating 2/6/14 resulted in a Violation Notice (VN) being sent to the company for failure to obtain a PTI. The rubber extrusion process was determined not to meet the exemption in Rule 286(a) for plastic extrusion because of the potential presence of Hazardous Air Pollutant (HAP) containing materials. The VN was resolved with the application and issuance of PTI 61-14, which includes material throughput limits on HAP containing materials and a source-wide flexible group that limits individual and aggregate HAP emissions.

Due to the conditions set in PTI 61-14, specifically the requirement to limit HAP below major source thresholds, this source is classified as a Synthetic Minor Opt-Out source and required to submit annual MAERS reports. Reporting year 2015 will be their first required submittal.

Compliance Evaluation**EURUBBEREX**

This is the emission unit (EU) for the seven extrusion lines, two natural gas-fired autoclaves, and one natural gas-fired curing oven utilized to produce the tubing and hoses produced by the company. This EU identifies material throughput limits for those materials that contain HAPs. The only material currently being utilized by the company on this list is Chlorinated Polyethylene (CPE), which has a limit of 900,000 lb/yr based on a 12-month rolling time period.

Attached is a spreadsheet that lists the total throughput for extrusion processes and includes monthly totals for

CPE throughput. The total throughput on a 12-month rolling time period is currently exceeding the limit of 900,000 lbs. and has been discussed with the company. The current usage is about 1.3 million pounds of CPE.

FGFACILITY

This is the flexible group that limits emissions of individual and aggregate HAPs to below 90% of the major source threshold, therefore classifying this facility as a Synthetic Minor Opt-out. The company provided me with an emission spreadsheet that tracks HAP emissions based on material throughput. Aggregate HAPs for the last 12-month rolling time period, February 2015 through January 2016, totaled 1.98 tons. This is well below the limits for both individual and aggregate HAPs of 9.0tpy and 22.5tpy, respectively.

Summary

After arriving at the facility and being directed to the appropriate contact I began a pre-tour meeting with Chelsea. We were later joined by Donna before taking the walk-through tour. During the meeting, I discussed my purpose for the visit and provided a copy of the Environmental Inspections brochure.

During the walk-through I was shown the operation of their most complicated extrusion line (#7), which is a good representation of the rubber extrusion process being performed by the company. Chelsea explained to me that plastic, which is a portion of the process that is exempt from permitting via Rule 286(a), is initially extruded to form a tube. Rubber is then extruded and applied to the outside of the plastic tubing. The plastic is removed from the rubber, chipped, and recycled to the start of the system to be used again. Next, the rubber tubes are cured using autoclaves and an oven.

The autoclave was operating and appeared to maintain a temperature from 285-302°F. The oven was also operating, and maintained a fairly constant temperature of 365°F.

The other areas of the plant were used for exempt processes, including a maintenance area with a small Safety Kleen parts washer and an area for welding projects. There are no boilers or process heaters on site; the company uses electric and gas for building heat.

A site visit dating 3/24/16 was aimed to address the apparent exceedance of the permitted limit of CPE on a 12-month rolling time period. I met with the new Health and Safety Coordinator, Amanda Dumond, whom is aware of the situation. It is the intention of Martinrea to apply for a permit modification to increase the limit of CPE use that will reflect current operations, as well as allow for growth of the company. Amanda indicated that Martinrea would seek to change the limit to 3.5 million pounds per year of CPE.

Compliance Status and Recommendations

This facility is not currently in compliance with PTI 61-14 based on CPE throughput. However, actual emissions of HAP are well under permitted limits, which is in compliance from an air emission standpoint as a synthetic minor opt-out source.

I recommend that the company apply for the permit modification to allow increased usage of CPE and remove the materials from the permit that are not utilized. Pending permitting and modeling review do not show this increase to exceed HAP emission limits, I would agree with their request to grant them a permit modification.

A compliance concern letter will be sent to the company detailing these recommendations; in particular, the action required in order to proceed with the aforementioned permit modification and associated timeline of events will be addressed.

NAME Fack Durban

DATE 3/29/16

SUPERVISOR 