

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Off-site Inspection

B729457489

FACILITY: Lear Corporation, Farwell Plant		SRN / ID: B7294
LOCATION: 505 HOOVER ST, FARWELL		DISTRICT: Bay City
CITY: FARWELL		COUNTY: CLARE
CONTACT: Kathleen Kelly ,		ACTIVITY DATE: 03/03/2021
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Off-Site inspection of MI-ROP-B7294-2018. Facility was in non-compliance with VOC limits for EUCANNONLINE.		
RESOLVED COMPLAINTS:		

Records Request Date: 3/1/2021

Lear Corporation/EGLE-AQD staff involved:

- Gina McCann (EGLE-AQD, Senior Environmental Quality Analyst)
- Kathleen Kelly (EHS Specialist I-Lear Corporation)

Mid-March 2020 the State of Michigan was placed under restrictions to limit the spread of Covid-19. Department of Human Health and Services orders required State of Michigan residents to adhere to social distancing guidelines in response to the Covid-19 pandemic crisis. At the request of Lear Corporation an off-site inspection was performed in lieu of an in-person inspection. EGLE-AQD staff performed a records review of MI-ROP-B7294-2018 as part of the FCE.

On March 1, 2021, EGLE-AQD staff sent a records request to Lear Corporation and met via a MS Team call March 3, 2021. Due to issues sending large files, emissions records were received on March 12, 2021.

The facility was in non-compliance at the time of this inspection. EUCANNONLINE exceeded the 12-month rolling VOC emission limit for (5) five months in 2019. A violation notice will be sent.

The Renosol Seating Facility (RSF) is owned by Lear Corporation EEDS & Interiors, an international company specializing in automotive components. The facility manufactures molded polyurethane automotive seating, head rest, and arm rest cushions.

The process flow at RSF starts with blending operations. Raw materials are blended according to clients specifications. The blended material is poured into a mold that has been coated with a mold release agent. After the material cures it is removed from the mold and moves to a trimming operation. Various molds will then receive an anti-squeak coating prior to being sent to packaging/shipping.

EUPOLYOLBLENDING

Blending operation consists of a batch operation of filling, blending, and un-filling polyol in a tank. This emission unit originated in PTI No. 91-06C and does not have any Special Conditions originating from that PTI. This emission unit is subject to 40

CFR Part 63, Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources.

Special condition (SC) II.1. and VI.1 restrict the use of material containing methylene chloride as an equipment cleaner to flush the mix head or a mold release agent. Compliance with the NESHAP is demonstrated through Safety Data Sheets (SDS) and engineering calculations. Ms. Kelly provided an SDS for RU7150R which does not contain methylene chloride. Additionally, an initial compliance certification containing compliance statements regarding the non-use of methylene chloride, signed by a responsible official, shall be kept on file. A review of the hard copy general file produced a copy of the previously reported compliance statement.

FGFOAMLINES

The flexible group consists of EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1 and EUSMALLPARTS#1. The process consists of application of manually applying a mold release wax to clean molds using an HVLP spray gun or comparable technology in one of four (4) production or prototype lines. Molds are then conveyed to a robotic station where foam components are extruded into the mold halves, which are then closed. The foam expands and cures while it is conveyed to the demold station, where the molds are opened and the cushions are removed, cleaned, and inspected. The empty molds are cleaned and conveyed to the mold release application station for reuse. This flexible group is subject to 40 CFR Part 63, Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources.

SC I.1. through SC I.4. limit VOC emissions from the various emission units at the facility. SC VI.3. is the associated monitoring and recordkeeping requirements to monitoring and record, on a monthly basis for each emission unit in FGFOAMLINES the following information:

- a. Gallons (with water) of each mold release agent used;
- b. VOC content (minus water and with water) of each mold release agent as applied;
- c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month;
- d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The facility maintains the appropriate records. Below are the emissions for each line, based on the 12-month rolling time period ending January 2021.

Pollutant	Limit	Emission Unit	Emissions (tpy)
1. VOCs	94.5 tpy	EUSEATINGLINE#4	62.61

2. VOCs	60.0 tpy	EUCANNONLINE	40.91
3. VOCs	2.5 tpy	EUPROTOTYPELINE#1	0.07
4. VOCs	24.0 tpy	EUSMALLPARTS#1	19.72

I reviewed VOC emissions data from January 2016 through February 2021. EUCANNONLINE exceeded the 12-month rolling VOC emission limit for (5) five months in 2019. The table below shows the VOC emissions for the (5) months in 2019 that were exceeded. A violation notice will be sent.

12-Month Rolling Time Period	VOC Emissions (tpy)
3/2019	60.64
4/2019	61.13
5/2019	60.98
8/2019	61.86
9/2019	61.12

SC II.1. restricts the amount of VOCs in the mold release to less than 6.15 lb VOC/gal (minus water). According to RSF's supplier, Chem-Trend, the mold release has a VOC content of 6.0 lb/gal.

SC II.2. limits the amount of Toluene diisocyanate (TDI) to 11,110 lb/day. SC VI.4. is the associated monitoring and recordkeeping condition that requires the facility to keep daily usage records of toluene diisocyanate in pounds per calendar day for EUCANNONLINE. I reviewed material usage records from January 1, 2016 through February 28, 2021. Daily TDI usage ranged from 11,051 pounds on August 11, 2016 to 205 pounds on January 1, 2017. TDI usage is tracked on a separate spreadsheet

and calculated by taking TDI usage for the entire plant and dividing by the number of parts EUCANNONLINE processed.

SC III.1. requires the facility to capture all waste material including waste mold release agents, purge solvents, and waste coatings from all coating applicators and shall store them in closed containers. According to an email from Ms. Kelly, the facility does not purge their lines so we do not generate any waste from cleaning. Without the ability to be on-site this requirement is hard to verify compliance is being maintained.

SC III.2. requires the facility to handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. SC IV.1. requires the facility to equip and maintain emission units in FGFOAMLINES with high volume low pressure (HVLP) spray guns or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. At the request of the facility, AQD did not access the site. Without the ability to be on-site this requirement is hard to verify compliance is being maintained with these conditions.

SC VI.2. requires the facility to maintain a current from the manufacturer of the chemical composition of each mold release agent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturers formulation data, or both as deemed acceptable by the AQD District Supervisor. Ms. Kelly provided the appropriate SDS in an email.

SC VI.5. requires the facility to keep a compliance certification on file containing the following statements, and must be signed by the responsible official:

a. "This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with 63.11416 (c)(1)."

b. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 63.11416 (c)(2)." A review of the hard copy general file produced a copy of the previously reported compliance statement.

The facility was in non-compliance at the time of this inspection. EUCANNONLINE exceeded the 12-month rolling VOC emission limit for (5) five months in 2019. A violation notice will be sent.

NAME 

DATE 3/31/2021

SUPERVISOR 