

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

N114752435

FACILITY: LEAR CORPORATION		SRN / ID: N1147
LOCATION: 1110 Woodmere Ave., TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT: Rick Warfield, Maintenance Manager		ACTIVITY DATE: 02/18/2020
STAFF: Jodi Lindgren	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2020 Full Compliance Evaluation inspection and record review report including permit void		
RESOLVED COMPLAINTS:		

FACILITY DESCRIPTION

On Thursday October 24, 2019, Jodi Lindgren of the Department of Environmental, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted a scheduled inspection of Lear Corporation (Lear) (N1147) located at 1110 Woodmere Avenue, Traverse City, Grand Traverse County, Michigan, 49686. Mr. Rick Warfield, Maintenance Manager, of Lear was present to accompany AQD staff during the plant inspection. Lear was a minor source of hazardous air pollutants (HAPs) and held three air use permits, Permit-to-Install (PTI) 216-01, PTI 46-95, and PTI 200-70.

PTI 216-01

Lear was a minor source of HAPs due to the use of a methylene chloride batch vapor degreaser. PTI 216-01 was issued on August 22, 2001. The vapor degreaser was utilized to clean electrical connectors. As methylene chloride is a halogenated HAP, the process was subject to the standards and recordkeeping requirements of 40 CFR Part 63 Subpart T (NESHAP T). The facility updated their process eliminating the need for the vapor degreaser (EUDEG) in January 2019. All of the permitted process equipment has been dismantled and removed from the facility. Lear requested to void PTI 216-01. The void was approved via a letter dated November 6, 2019.

A. EUDEG – One methylene chloride batch vapor degreaser utilizing freeboard ratio greater than 1.0, superheated vapor, and dwell time to minimize emissions. The facility updated their process eliminating the need for EUDEG. Lear records indicate that EUDEG was permanently discontinued in January 2019. AQD staff verified the equipment was completely removed at the time of inspection.

1. Emission Limits – PTI 216-01 established a VOC limit of 6.4 tons per year (tpy) calculated at the end of each month using a 12-month rolling time period. At the time of discontinued use, records provided by Lear indicate 2.16 tpy of VOC emissions calculated for a 12-month rolling time period of February 2018 to January 2019. These records indicate compliance with the emission limits established in PTI 216-01 (records are attached).

2. Material Usage Limits – PTI 216-10 restricted the use of methylene chloride to no more than 1150 gallons per year calculated at the end of each month using a 12-month rolling time period. At the time of discontinued use, records provided by Lear indicate 28.875 gallons of methylene chloride were used calculated for a 12-month rolling time period of February 2018 to January 2019. These records indicate compliance with the emission limits established in PTI 216-01 (records are attached).

3. Process/Operational Limits – PTI 216-01 requires work and operational practices consistent with 40 CFR Part 63 Subpart T. At the time of inspection, the vapor degreaser had been removed so operational practices could not be observed.

4. Monitoring – PTI 216-01 mandates monitoring according to 40 CFR 63.466 including weekly temperature measurements during idle mode, monthly windspeed, and monthly determination of hoist speed. Current records were not available due to the discontinued use of the vapor degreaser. To demonstrate compliance, Lear did have records available from when the equipment was still in use.

7. Recordkeeping/Reporting/Notification – PTI 216-01 dictates regular exceedance reports and annual solvent emission reports be submitted to the AQD District Supervisor, monthly and 12-month rolling time period VOC emission calculations be kept, and recordkeeping requirements of 40 CFR 63.467 be completed. During the inspection time period of October 2018 to September 2019, all exceedance reports were submitted timely and VOC emission calculation were adequate demonstrating compliance with PTI 216-01 (records attached).

8. Stack/Vent Restrictions – There are no stack nor vent restrictions associated with EUDEG; therefore, this section is not applicable.

9. Other Requirements – There are no other requirements associated with the continued compliance of EUDEG; therefore, this section is not applicable.

PTI 46-95

PTI 46-95 was issued on June 23, 1995 for a soil and groundwater remediation system. EGLE Remediation and Redevelopment Division in the Cadillac District Office verified the remediation had been granted closure and that all associated equipment had been removed. Lear requested to void PTI 46-95. The void was approved via a letter dated December 4, 2019.

PTI 200-70

PTI 200-70 was issued on February 16, 1971 for a wood-fired boiler. Use of the wood-fired boiler had been discontinued more than a decade prior to the inspection. AQD staff noted there was no indication of a wood-fired boiler at the facility. Lear requested to void PTI 200-70. The void was approved via a letter dated December 4, 2019.

ADDITIONAL EQUIPMENT

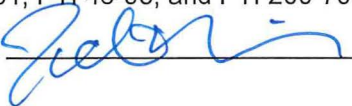
During the inspection, AQD staff noticed an unpermitted wastewater evaporator. Lear claimed the wastewater evaporator meets the requirements for exemption under Rule 336.1285(2)(m) (R 285(m)). On February 6, 2020, Lear provided AQD staff with a collection of SDS sheets for all materials which may be in the wastewater. No VOC or other compounds of interest were noted. Lear stated that about 25 gallons of wastewater is processed in the evaporator per month. Use of exemption R 285(m) appeared to be appropriate at the time of inspection. (SDS sheets attached)

Lear informed AQD staff of a new adhesive coating line being added to the facility's process during the inspection. The coating line had not been fully installed. AQD staff was shown the proposed area and told it would be vented to atmosphere for the comfort of facility employees. Once fully operational, the coating line will be considered in operation for 24 hours per day but could be used less than one hour per day. The adhesive coating will be applied by injection with the use of a robotic arm. The SDS sheet for the adhesive was also supplied to AQD. AQD staff provided Lear guidance and information to help them determine the applicability of any potential exemptions or the need to get an air permit. Lear decided that exemption Rule 336.1287(2)(c) (R 287(c)) would apply to their adhesive coating line. R 287(c) exempts a surface coating line from obtaining an air permit if the coating rate is not more than 200 gallons per month, the exhaust system only services spray coating equipment and controlled with a dry filter installed, maintained, and operated in accordance with the manufacturer's specification, and monthly coating use records are maintained on file and made available to AQD upon request for the most recent 2-year period. Lear completed the installation of the hood and exhaust system by December 1, 2019. The single spray adhesive coating line is the only equipment serviced by the exhaust. They installed a 1-inch thick nonwoven polyester media air filter with a rating of MERV 7, 86% Arrestance Efficiency, and 500 feet per minute maximum air flow. Lear indicated they will be using the "RULE 287(2)(c) PERMIT TO INSTALL EXEMPTION RECORD: SURFACE COATING EQUIPMENT" form (EQP 3562) provided by EGLE AQD to track their coating usage. Pictures of the hood and exhaust system, dry filter specifications, and adhesive SDS sheet provided by Lear is attached.

EVALUATION SUMMARY

Conclusion – Based upon the Full Compliance Evaluation, it appears the source was in compliance with PTI 216-01, PTI 46-95, and PTI 200-70 at the time of the evaluation.

NAME



DATE

2/25/2020

SUPERVISOR

