

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

N200338702

FACILITY: Yanfeng US Automotive Interior -SOUTHVIEW/PMSC/CW		SRN / ID: N2003
LOCATION: 1600 S. WASHINGTON AVE., HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Jeff George , Environmental Lead		ACTIVITY DATE: 02/15/2017
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

This was a schedule investigation of the multi building complex. The entire facility is comprised of the Southview complex, Cottonwood, and the PMSC.

All buildings are included in the facility opt-out permit (267-00). This permit limits only the Hazardous Air Pollutant (HAP) emissions to below the major source thresholds. The only VOC emissions limitation for the source is the plastic part coating operation in Southview. All other operations are either 287 or 290 exempt and have thresholds that would not combine with the permit limits to cause them to exceed the 100 ton VOC major source threshold. HAP emissions are being tracked to show compliance with the Opt-Out permit.

Misc. solvent use at the entire operation is reported under RG-Solvent in MAERS. The company uses various solvents for cleaning and lubricating parts and tools, mostly from aerosol cans. Some of this is from paint line purging. These operations are all permit exempt using Rule 290.

All of the buildings are heated by natural gas fire air makeup units. These are all permit exempt due to Rule 282 (2)(b).

Southview Plant

There are 4 buildings sections (A, B, C, and D) which are all physically connected into one large building. This building is houses many automotive part manufacturing operations. Plastic parts are the primary products manufactured. Some parts are coated with paint, or adhesive and fabric. Some parts are assembled with other hardware prior to shipping.

A diesel 200 Hp fire pump and a 231 Hp diesel generator are on standby for use in emergencies. Both have run meters installed and have records of oil changes etc. as required by the RICE MACT.

"A" Building

The building contains 4 laser cutters. They are vented into a FARR fabric filter. This has a pulse jet cleaning mechanism. The exhaust from the filter is vented indoors during cold weather and is diverted outdoors during the summer. There were no VE's. This operation is exempt from the need for a permit by Rule 285(2)(l)(vi). The differential pressure gauge was reading 4.1 inches of water.

There is an immersion type cold cleaner that uses mineral spirits in this building. The cleaner complies with R707.

The plastic parts coating operation installed under PN 57-10 was observed in operation. This consists of EUPARTSWIPE and EUPLASTICPARTS. The pre-wipe is done by hand with isopropyl alcohol. The evaporated alcohol is not collected into the RTO. The coating line has two enclosed booths. The first one robotically sprays the pigmented color coat. After passing through a flash zone, the second booth robotically sprays either a second coat or a clear coat topcoat. No primers are used at this time. The parts then pass through a flash tunnel and oven. The RTO collects the emissions from the two booths, the flash zones, and the cure zone. The RTO is required to operate at a temperature above 1500 deg. F. The combustion chambers were operating at 1643 deg. F and 1656 deg. F. The temperature of the RTO exit gas was 155 deg. The company is in compliance with the permit. Both booths had proper filters installed. The filters are changed daily. Coating usage is recorded per shift, per day, and per month. This is all entered into a spreadsheet, where the 12-month rolling averages are calculated.

The manual paint booth has been removed from the plant.

The masking booth and the mask washer have both been removed from the plant.

There is several plastic injection molding machines located in this area. The VOC emissions are being calculated and reported. These are permit exempt under Rule 286(2).

A new solvent distillation operation (still) has been installed in the plant. The manufacturer of the still is "Becca". About 10-12 gallons per day are processed per day. The operation of this equipment will result in lower solvent emission totals for the plant. The recovered solvent can be used for line purges to save on virgin solvent use.

"B" Building

There are two tub over barrel style cold cleaners that use mineral spirits in this building. The cleaners comply with R707.

There are two natural gas fired oil heaters used to warm the plastic injection dies. One is rated at 6.5 MMbtu/hr and the other is rated at 7.0 MMbtu/hr. These are exempt from permitting by R282.

An adhesive spray line consists of one booth. The adhesive is water-based and is listed at 1 to 5 % VOC. It is "Trim-Bond Heat Activated" made by PPG. Records are being kept of the usage and emissions. The operation is in compliance with the Rule 290 exemption.

There is an internally vented plastic grinder with a fabric filter.

Many Reaction Injection Molding (RIM), Plastic Injection Molding (PIM), and Slush Molding machines are operated in this building. The VOC emissions are being calculated and reported. These are permit exempt under Rule 286(2).

"C" and "D" Buildings

The "C" Building is the office. There is no equipment in the "D" building that result in a notable amount of emissions.

New Process

A new Electronics Assembly and Soldering Operation is planned to be installed in the near future. There will be several steps involved in the process. A permit exemption demonstration has been submitted for this process.

PMSC Plant

This building is located at nearby Airport Court. It is now known as "Past Model Service Center". The operations in this building are all related to filling orders of parts for past vehicle models. Troy Paasman is the process engineer in charge of keeping records for this area.

Permit #192-90A auto headliner production equipment was voided on 4/21/2016. This line (lamination line, form press, and spray adhesive booth) has been removed from the building. The thermal oxidizer is still in place but nothing is connected to it.

They have an exempt (Service Paint) spray paint booth. The use is very low and emissions are very low. Filters were properly in place to catch the overspray. Records are being kept on a spreadsheet to show compliance with R287. A Binks oven is used to cure the parts.

The Polybond adhesive operation is still in the building. The usage is very sporadic and the emissions are very low. The operation uses a roll applicator for the adhesive and the catalyst is sprayed on. The equipment is exempt under R 287. Proper records are being kept.

Cottonwood Plant

This building is located adjacent to the Southview plant although it is part of the PMSC operations. There are no specific permits for the operations in this building. This building is used for service only, and not for any new model production. Most of the building is used to house the old machines used to fill re-orders of various auto parts. The machines are brought out of storage long enough to move them to the PMSC plant, make a few parts to rebuild the inventory, and then put back into storage.

NAME Dale Tustin

DATE 2/23/17

SUPERVISOR MD 2/24/2017