

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

N705528345

FACILITY: Cooper Standard Automotive Inc.		SRN / ID: N7055
LOCATION: 645 Aulerich Road, EAST TAWAS		DISTRICT: Saginaw Bay
CITY: EAST TAWAS		COUNTY: IOSCO
CONTACT: Howard Scholtz III, HSE		ACTIVITY DATE: 01/15/2015
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled site inspection for minor source- only exempt emission units onsite.		
RESOLVED COMPLAINTS:		

On Thursday, January 15, 2015, a scheduled site inspection was conducted at the Cooper Standard Automotive (CSA) Facility (SRN N7055) located in the East Tawas Industrial Park, at 645 Aulerich Road, East Tawas, Michigan.

The last inspection of the site was conducted on October 16, 2009. At that time one active/open Permit to Install (PTI) 351-01 was of record for the facility. The referenced permit is for vacuum canister/vinyl tubing assembly work station which uses methylene chloride to create a solvent bond between the tubing and vacuum canister. The referenced permit was voided on August 6, 2013, as a result of the company reporting removal of the permitted equipment.

In addition to the referenced permit two (2) voided PTIs are of record for the facility and include: 287-02 (voided November 21, 2003) for a pyrolysis cleaning furnace that was not installed and 1282-91 (voided November 29, 2001) for an adhesive dip process.

Site inspection activities were conducted with the intent of confirming the operational status of the permitted equipment and that monitoring/reporting activities were being conducted per the referenced permit and applicable exemptions. Mr. Howard Scholtz III, HSE for the facility provided a tour of the facility, and general overview of operation and practices.

FACILITY DESCRIPTION

CSA is an international company specializing in automotive components. The subject site is part of the Fluid Systems Division, and per the company website is reported to produce injection moldings and quick connects. A review of District Files indicates that ownership of the subject site changed to CSA on February 7, 2006. Prior to that date the subject site was operated under/known as ITT Automotive, ITT Industries, ITT Industries Fluid Handling Systems and ITT Higbie Baylock (ITT).

Records indicate that up to four ITT facilities were operated in the Tawas, East Tawas and Oscoda, Michigan areas. The four locations of record include;

- N7240 located at 4700 Industrial Row, Oscoda
- N7055 located at 645 Aulerich Road, East Tawas (subject site)
- N5071 located at 620 9th Ave, Tawas City and
- N0571 located at 4676 N. Industrial Row, Oscoda (merged with N7240)

Of the referenced facilities, the CSA website indicates that there are only two active facilities within the Saginaw Bay District, which includes the subject site as well as SRN N7240. As previously indicated, during discussions with CSA staff, it was determined that N0571 and N7240 were determined to be the same physical location, and AQD databases have been changed to reflect the N7240 SRN for associated permits. Property associated with the N5071 facility was sold by CSA in Spring 2008, and is presently owned and operated by AuSable Industries

The subject site is located in the East Tawas Industrial Park, west of US 23. The facility is bounded to

the east, west and south by other industrial facilities and to the north by the Huron National Forest. (See aerial)

The facility consists of one main building which houses the main manufacturing area, warehouse, mold maintenance area and offices. In addition two smaller independent buildings exist and are used for chemical storage and adhesive coating activities, respectively.

Activities in the main manufacturing area onsite consist primarily of injection molding production activities, though some light assembly is also conducted. CSA personnel reported approximately 60 injection molding stations at the facility, which produce parts for automobiles. This automated process uses predominantly nylon chips, though other miscellaneous resins are also used. The resin chips are manually fed into a bulk hopper, from which the chips pass into a dryer, then a heated barrel, where the materials are melted. The liquid materials are then injected into molds and cooled which creates the final product. Material waste generated during production activities is reported to be ground up and recycled back into the injection molding process. The process is for the most part entirely enclosed, with no open vats of liquid materials. No VE were noted during the site inspection, though the odor of warmed plastic was prevalent during the site inspection. Based on a review of R 336.1286 (b) exemptions for plastic processing equipment, it appears that these processes are exempt from requiring a permit.

Parts washing activities are conducted in the mold maintenance area, as well as in the general maintenance area. CSA staff reported total surface areas for the two cold cleaners onsite as each being less than 10 square feet, with capacities of approximately 30-gallons and 16-gallons, respectively. Cleaning solutions used and waste services are provided by an appropriate vendor. Based on information provided, it appears that the equipment and associated activities are exempt under R 336.1281 (h) which pertains to cold cleaners with air/vapor interfaces of not more than 10 square feet.

Also conducted in the general maintenance area located in the southern portion of the building is a non-production welding station, as well as other non-production equipment. Based on review of the regulations, equipment housed in this area would be exempt from permitting under R 336.285 (I)(vi)(A) and (B).

Operated in a separate building behind (north) of the main building is a surface coating process for small plastic parts. The process coats and cures plastic parts. Curing is done with small boiler (419,430 BTUs) located in the same building. The process was originally required to meet a specific client need, and was used on a limited basis, but more recently has remained idle for a number of years. Based on information obtained it appears that the process may be exempt under Rules 336.1287 (a) for surface coating equipment and 336.1282(a) for furnaces, ovens and heaters.

Also noted were the presence of closed-loop, water cooling towers, which provide non-contact cooling water for the injection molding machines. Based on the use it appears that these would be exempt under R 336.1280(d) which exempts water-cooling towers not used for evaporative cooling of process water.

The facility has an air emissions management program, summarizing activities and emission related information for the facility. ISO inspections for the plant resulted in ISO 14004 Certification. In addition, the facility reports both internal and third party audits are conducted every year for the facility.

COMPLIANCE EVALUATION / SUMMARY

Based on the information collected during the January 15, 2015, site visit, it appears that the facility is being operated in compliance with state permitting requirements. Based on activities conducted onsite, the following federal regulations may be of interest to the facility: Surface Coating of Plastic Parts and Products NESHAP Subpart PPPP. However, review of potential federal regulations indicated that the facility was not subject to any federal standards due to size, process or materials reported. sgl

NAME *Sharon Steble*

DATE *1/27/2015*

SUPERVISOR *C. Dore*