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

U63160910735648

FACILITY: Poltona Frau Group		**SRN / ID:** U631609107
LOCATION: 2655 Product Drive		**DISTRICT:** Southeast Michigan
CITY: Rochester Hills		**COUNTY:** OAKLAND
CONTACT:		**ACTIVITY DATE:** 07/13/2016
STAFF: Tyler Salamasick	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:**
SUBJECT: Investigation of facility per forward from MDEQ storm water section.		
RESOLVED COMPLAINTS:		

Background

Poltrona Frau Group (Poltrona Frau) has an automotive leather manufacturing and fabricating facility located at 2655 Product Drive, Rochester Hills, Michigan. The manufacturing facility was inspected on Wednesday 7/13/16 by Kerry Kelly and Tyler Salamasick of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspecting was to determine compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. The Air Quality Division was informed of Poltrona Frau Group's operations by MDEQ's Industrial Storm Water Program. The site contact is the maintenance supervisor, Ryan Lee.

Inspection

Site arrival was at 11:44 am Wednesday morning. The weather conditions were 84F with a west wind at 0-12 mph and clear. Poltrona Frau Group is located in a primarily industrial area with the nearest residential structure approximately 270ft east of the facility. I was greeted by Ryan Lee and the plant manager John Chase. Upon meeting Kerry Kelly and I showed both Ryan and John our State of Michigan identification cards. John informed me that Poltrona Frau has approximately 50 employees and operates an 8 hours shift from 6am until 2:30pm.

Ryan showed Kerry and I the facility and its operations from where the leather is received to the end product. This facility applies leather to dashboards, side panels, steering wheel covers and dash panels for high end sport cars. The facility purchases leather from Baber and Eagle Ottawa pre-treated and stained. They then inspect the leather for defects as a quality control measure. Once the leather is inspected, it is marked for cutting. The leather is cut in a patterned press which ventilates into the in plant environment. Once cut the pieces of leather can either go to a robotic spray booth on the south side of the facility or it can go to two hand sprayed booths on the north side of the facility. Poltrona Frau has a total of four stations, two hand held spray booths, one robotic spray booth and one acetone cleaning station. All four of the stations are vented to the outside air. The hand held and robotic stations had fabric filters in place. The filters at the robot were well maintained and clean. The filters in the booth currently being used for hand held sprayings were noticeably over used. There was a significant amount of glue accumulated on the filters, on the work station as well as the general work area. I asked Ryan how often the filters were replaced. He informed me that they were done weekly but the filters in the robotic area were done more frequently to prevent damaging the robot. Ryan was able to provide me with copies of the SDSs for the adhesive and the adhesive activating chemical. In addition to the SDSs I requested records for material usage, which Ryan informed me, would be harder to provide. The booth operator informed me that they went through approximately 1.5 to 2 containers of the 10kg rubber polyurethane dispersion per day and maybe only 0.33 to 0.5kg per day of the activator (hexamtheylene-di-isocyanate polymer). Hexamethylene-di-isocyanate is a listed hazardous air pollutant and air toxic. At the acetone booth the leather is roughed with sand paper and cleaned with acetone. After the plastic component is sprayed with the adhesive and activator mix the leather pieces are applied. Once the leather is applied and smoothed the adhesive is set with heat in a press which is vented to the indoor air.

After inspecting the process we went outside to view the stacks. The stacks on the north end of the facility had what appeared to be a white dry glue build up on the inside of the rain cap. Some of this material had come off and fallen on the nearby vehicles. The substance was a fluffy white material very similar in appearance to the material build up on the fabric filters in the spray booths. The build-up in the stack showed that the filters are not being changed frequently enough and/or they are not the appropriately design for the adhesive spray.

The AQD requested purchase or monthly records from Poltrona Frau but they did not provide them in a timely manner. John Chase and Megan Ranger responded via email and informed the AQD that Poltrona Frau uses 10kg of adhesive per day on the LX line with 1kg of the activator, while the KL line uses 20kg of adhesive per day with 2kg of activator. John Chase also informed the AQD that Ryan Lee is no longer the contact for the facility because he is no longer there. Since the facility has not provided monthly usage records and does not properly maintain and operate the filters they are not permit exempt for **R 336.1201** by the permit exemption **R 336.1287(c)(ii) and R 336.1287(c)(iii).** Also the facility does not fall under permit exemption **R 336.1287(a)** because the adhesive is not released to the general in-plant environment, but it is instead vented to the outdoor air.

Conclusion

It appears that they are in noncompliance with **R 336.1201**. It is recommended that they receive a notice of violation.

NAME _____ DATE 7/22/16 SUPERVISOR CJE