

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

P072137255

FACILITY: Poltrona Frau Group		SRN / ID: P0721
LOCATION: 2655 Product Drive, ROCHESTER HLS		DISTRICT: Southeast Michigan
CITY: ROCHESTER HLS		COUNTY: OAKLAND
CONTACT: John Chase , Plant Manager		ACTIVITY DATE: 10/18/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Resolution of a LOV as well as a scheduled inspection.		
RESOLVED COMPLAINTS:		

Background

Poltrona Frau Group (Poltrona Frau) is an automotive leather manufacturing and fabricating facility located at 2655 Product Drive, Rochester Hills, Michigan. The manufacturing facility was inspected on Tuesday 10/18/16 by 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. Poltrona Frau Group was issued a Letter of Violation on 8/03/2016 in response to a previous inspection conducted by AQD staff.

Inspection

Site arrival was at 3:45 pm Tuesday afternoon. 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 John Chase the plant manager. I showed John my State of Michigan identification card. John informed me that Poltrona Frau currently had approximately 50 employees and operates an 8 hour shift from 6am until 2:30pm. This is approximately 30% of their capabilities. John mentioned that if they got another contract they might look at expanding the facility operations into a near-by building. I informed John that if they expanded business, he should determine if he would need to obtain a permit to install.

John showed me the three adhesive lines and the associated filters per booth. The filters appeared to be in good condition. They were firmly pinned in place and I did not observe any areas with gaps in the filters. The filters did have a small amount of adhesive build up on the surface. This build up was not excessive. John provided AQD staff with copies of the hand written logs that indicated the amount of adhesive mixed per day as well as the scheduled filter changes. John stated that they changed the filters every Friday. The records appear indicated regular maintenance of the filters. Poltrona Frau's records do not indicate a monthly total coating usage in gallons, but instead shows daily usage in grams. **R 336.1287** states in part ... (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month... The AQD will use regulatory discrepancy and allow the facility to correct the record keeping discrepancy. John also stated that they were looking into a more permanent installation of the filters on the top of the stack. The filters on the top of the stack are not required by the permit exemption but if designed and operated properly could potentially provide the facility with an added particulate control. The current booth filters appear to meet the requirements of Rule R 336.1287(c)(ii).

Conclusion

Poltrona Frau Group appears to have corrected the issues cited by the Letter of Violation by meeting permit exemption from obtaining a permit **R 336.1201** by meeting the requirements **R 336.1287(c)**. The facilities adhesives are water based, they use small quantities (less than 100 gallons per month). It can be assumed that their actual emissions are not of significant value.

NAME DATE 11/9/16SUPERVISOR 