

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

P097148735

FACILITY: Plastic Omnium		SRN / ID: P0971
LOCATION: 1549 West Beecher, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: Greg Leininger, Facilities Engineer		ACTIVITY DATE: 05/02/2019
STAFF: Stephanie Weems	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

Minor Source: Scheduled Inspection of Plastic Omnium (P0971)

Facility Contacts:

Greg Leininger – Facilities Engineer

Phone: 517-265-1100

Email: greg.leininger@plasticomnium.com

Purpose

On May 2, 2019 I conducted an unannounced compliance inspection of Plastic Omnium, located at 1549 W. Beecher Adrian, MI. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act.

Facility Location

The facility is located in an industrial area. See Image 1 for an aerial photo.

Facility Background

Plastic Omnium is a facility that handles blowing and manufacturing of the plastic fuel tanks utilized by major automotive manufacturers.

Regulatory Applicability

The facility does not have a Permit to Install (PTI) on file with the AQD.

Arrival & Facility Contact

No visible emissions or odors were observed upon my approach to the facility. I arrived at approximately 9:45 AM, proceeded to the facility office to request access for an inspection, provided my identification, and met with Greg Leininger, the facilities engineer, who informed me that their safety and environmental person was out for the day at training. A pre-inspection discussion was held with Greg. I informed him of my intent to conduct a facility inspection and to review the various records as necessary. He extended his full cooperation, accompanied me during the full duration of the inspection, and fully addressed my questions.

Pre-Inspection Meeting

I began by talking with Greg about the facility and what they manufacture. He explained that they use blow molding to create plastic fuel tanks. He said that they assemble them onsite, and at the end of the process the fuel tanks are ready to be used for vehicles.

I asked Greg about the processes that they have at the facility. They have no boilers, one emergency generator, no painting operations, 9 Nitrogen blow molding units, a welding area, and they historically had a parts washer, though they had been in discussions of getting rid of it because they didn't use it much.

Greg informed me that the facility employs approximately 345 people, and that they run 3 shifts.

No photos are allowed inside the facility.

Onsite Inspection

Before entering the manufacturing area, a safety training binder had to be read and signed certifying an understanding of the facility's safety rules. Once that was done, Greg proceeded to guide me on a tour of the facility. We started by entering the manufacturing area. The blow molding stations are set near the door that we entered through. It was noted that housekeeping throughout the facility was immaculate.

After walking through this area, Greg showed me to the fabrication shop where the welding is conducted. There was no welding being done at the time of the inspection, but the area was well organized and clean.

We then went to the shop room where Greg last knew the parts washer to be located. The parts washer was no longer there, so Greg believed they may have removed it from the facility. He said he would check on it and let me know.

Post-Inspection Meeting

I held a brief post-inspection meeting with Greg. I provided him with the PTI exemption handbook and talked with him about the welding and blow molding exemptions. I let him know I would send a follow up email that he could share with his environmental person, and that it would include a few questions about their generator and processes.

I thanked Greg for his time and cooperation and departed the facility at 10:30 AM.

Inspection Follow Up Email

After the inspection a follow up email was sent to Greg asking about the generator, the parts washer, and multiple large, white tanks that were noticed upon my drive away from the facility (Image 2). The email correspondence is attached with this report in the AQD paper file for this facility.

In his response Greg confirmed that there are no longer any cold cleaners on site. He also informed me that the tanks I asked about are material silos that hold the following:

3 silos that have HDPE in them that hold 92,000Kg

2 silos that have regrind in them that hold 70,000Kg

1 split silo up/lower that they hold a solid adhesive in - each side holds 29,000Kg. SDS included for solid adhesive.

Additionally, Greg sent information and maintenance logs for the generator. The generator was installed in 1996.

Furthermore, in order to determine a possible exemption, additional information was then requested from Greg about the facility's adhesive process. Multiple emails were sent to Greg requesting this information. On 7/15 a voicemail was left for Greg requesting his response either through email or a return call.

On 7/16 an email was sent to Greg reiterating the importance of the requested information. Greg was informed that a response was requested by July 24th, and no response would result in a violation notice (VN).

A response was not received on July 24th.

Compliance and Exemption Review

The Nitrogen plastic blow molding equipment and associated plastic resin handling storage silos are exempt under Rule 286(2)(c)(ii).

The welding operations are exempt under Rule 285(2)(i).

The emergency generator is exempt under Rule 285(2)(g). It is also not subject to any New Source Performance Standard (NSPS) because of it having an installation year of 1996.

I informed Greg of the possibility of the facility's need to comply with 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (also known as the RICE MACT). I explained that EGLE did not currently have delegation to enforce this regulation, but the facility should determine if they are required to comply with it and what all they need to do to show compliance if they should ever need to.

NOTE: As of July 19, 2019 EGLE is now delegated to implement 40 CFR Part 63 Subpart ZZZZ. It appears that Plastic Omnium is keeping maintenance records as required by the regulation. Due to the lack of delegation during the time of the inspection and the issue of not receiving requested information from the facility, a determination of compliance with this subpart could not be made at this time.

Compliance Summary

Based upon the inability to determine compliance of all processes at the facility, a VN will be sent to the company.

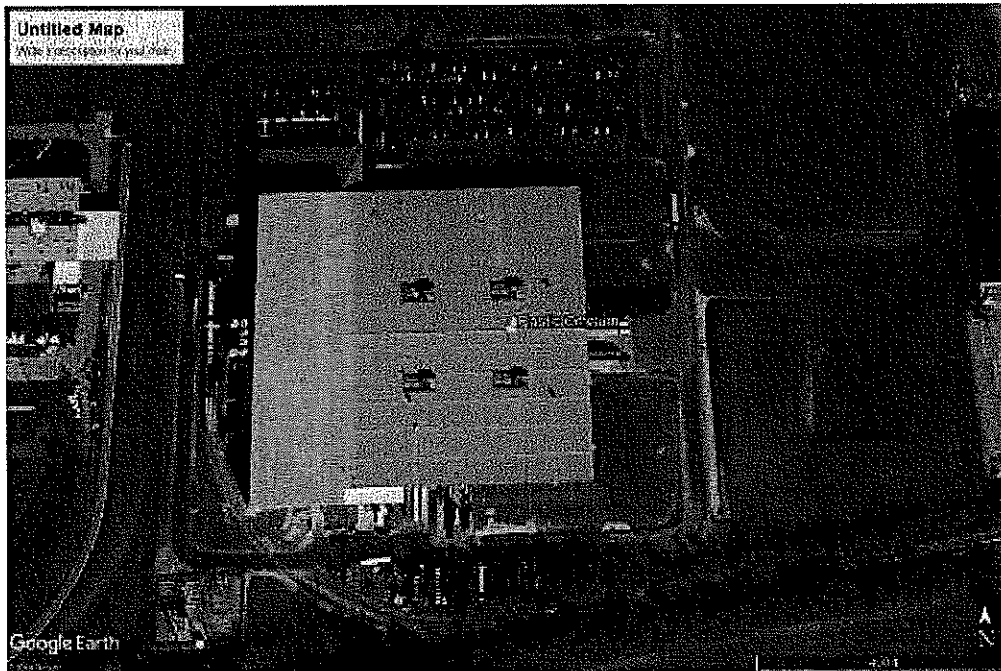


Image 1(1) : Aerial photo.



Image 2(2) : Material silos for plastic blow molding resin storage.

NAME *[Handwritten Signature]*

DATE 7.26.19

SUPERVISOR *[Handwritten Signature]*