

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

FY 2015 Insp-

U63150056928308

FACILITY: US Farathane Corporation (USF)	SRN / ID: U631500569
LOCATION: 750 West Maple Road	DISTRICT: Southeast Michigan
CITY: Troy	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 01/14/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of US Farathane Corporation (USF)	SOURCE CLASS:
RESOLVED COMPLAINTS:	

U-63-15-00569_SAR_2015_01_14

US Farathane Corporation (USF) (U-63-15-00569)
750 West Maple Road
Troy, Michigan 48084-5315

Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations.

On January 14, 2015, I conducted a level 2 self-initiated inspection of US Farathane Corporation (USF) ("Farathane"), in a business of plastic injection molding, located 750 West Maple Road, Troy, Michigan 48084-5315. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Frank Lauricella (Phone: 248-824-1500-ext. 1414; Cell: 586-360-4072; Fax: NA; E-mail: FLauricella@USFarathane.com), Facilities Manager, and Mr. Adam Misuraca (Phone: 248-754-7000-ext. 1041; Cell: 586-855-9050; Fax: NA; E-mail: AMisuraca@USFarathane.com), Corporate EHS Coordinator, assisted me.

US Farathane is in business of molding plastic parts for mostly automotive industry: Big 3 and Tier-I suppliers. Farathane operates ten (10) plants in US with sales of \$450 million. This Troy plant employs 200. It moved into Troy plant about 2011. US Farathane is sold, about a couple of weeks ago (January 2015), to a private equity firm The Gores Group of Auburn Hills for five hundred (500) million dollars.

Farathane uses mold-release agents that are not solvent-based. No reaction injection (2 or more components with catalyst) is done. All molding is thermo-set injection molding: mostly, polypropylene, some acetyl. From totes on ground floor, pallets are sucked into hoppers on mezzanine and dried using electric heat to drive off moisture.

Pallets thus dried (free of moisture) are supplied to thirty seven (37) injection molding machines (Toshiba, Milacron, Van Dorn, etc.) using pneumatic conveying (vacuum). The parts (mostly automotive) are injection molded. Assembly area is present.

Pursuant to Rule 336.1286 (plastic processing), the plastic injection molding machines /

processes are exempt from Rule 336.1201 (Permit-to-Install).

No painting.

Cold-cleaner Safety-Kleen Model 250

There is one Safety-Kleen Model 250 3'x4' parts-cleaner / cold-cleaner with spray and brush and a solvent tank. It is "sink on tank" type. The cold-cleaner is subject Rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Safety-Kleen supplies the solvents and services the cold-cleaner. Mineral spirits containing no halogenated solvents is used. Once in six months, dirty solvent is picked up for disposal or recovery by Safety-Kleen.

The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

About January 14, 2015, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice described in the procedures. During FY2015 inspection, the work-practice procedures were not posted. Besides, mechanically assisted lid was open. Both are violations of the Rule 707. Spent solvent is disposed of as RCRA Hazardous Waste or solvent is recovered by Safety-Kleen.

100% VOC petroleum distillate solvent. Safety-Kleen Premium 6605, 6638 (Safety-Kleen Corporation, Columbia, SC 29201, 803-933-4200)

Flash Point (FP) = 148 °F Tag Closed Cup (TCC). Auto Ignition = 410 °F. Boiling Point (BP) = 350 °F @ 760 mm Hg. Vapor Pressure (VP) = 0.2 mm Hg at 68 °F. Specific Gravity (SG, Water = 1.0) = 0.8. Density (ρ) @ 68 °F = 6.5-6.8 lbs. / gallon (0.78-0.82 kg /L). Flammability range = 0.7 %v (LEL) – 6%v (UEL).

Conclusion

Pursuant to Rule 336.1286 (plastic processing), the plastic injection machines / processes are exempt from Rule 336.1201.

NAME J. S. Le newhall DATE 01/20/2015 SUPERVISOR CTE