# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Self Initiated Inspection** 

FACILITY: LEAR		SRN / ID: N7691	
LOCATION: 26575 NORTHLINE RD, TAYLOR		DISTRICT: Detroit	
CITY: TAYLOR		COUNTY: WAYNE	
CONTACT: Roger Koenigsknecht, Director - Operations, Terminals, & Connectors		ACTIVITY DATE: 09/27/2017	
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor	
SUBJECT: Self-Initiated Inspect	on, FY 2017	The second secon	
RESOLVED COMPLAINTS:	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	

INSPECTED BY: Jonathan Lamb, MDEQ-AQD

PERSONNEL PRESENT: Roger Koenigsknecht, Director - Operations, Terminals & Connectors; Didier Dimas,

Continuous Improvement Manager.

FACILITY PHONE NUMBER: 734-946-9063 FACILITY FAX NUMBER: 734-946-1638 FACILITY WEBSITE: www.lear.com

#### **FACILITY BACKGROUND**

Lear Corporation is a Tier One supplier of automotive interiors. The Lear – Taylor Plant belongs to the Electrical Systems Division of the company. This facility manufactures plastic injection-molded electrical components for the automotive industry. Lear has been at the present location since 1991; previously it was the site of Taylor Tube. There are currently 150 employees. The facility operates three shifts, Monday through Friday, 24 hours per day.

#### COMPLAINT/COMPLIANCE HISTORY

There have been no complaints registered to this facility in the database and no violation notices issued to the facility. The last inspection at the facility on November 9, 2005, found the facility to be in compliance.

#### PROCESS DESCRIPTION

I arrived at the facility on September 27, 2017, and met with Roger Koenigsknecht, Director - Operations, Terminals, & Connectors, and Didier Dimas, Continuous Improvement Manager, and informed them of the purpose of my visit.

The manufacturing floor contains approximately 42 plastic injection molding presses all below a 440 ton capacity. Each press manufactures a different component, most of which are used as support for the electronics in automobiles, such as junction boxes and wire harnesses. There are three 45,000-pound silos located behind the building which are used to store plastic pellets used for the injection molding. Pellets are moved from the silos to surge bins located inside the building prior to use. Pellets are manually unloaded from the surge bins and loaded into hoppers at each injection molding machine, where the pellets are heated to 550 degrees F to melt the plastic to allow it to be molded into the desired part. Approximately 40 different types of plastic are purchased per year with the majority being polypropylene. Emissions from the injection machines are vented inside the building.

The facility uses a noncarcinogenic mold release agent on the machines on a regular basis. The mold release agent is made by IMS Brand Product No. 123492, which comes in 16-oz. aerosol cans. Mr. Koeningsknecht said they use about 300 cans per year.

The injection molding machines are cooled using through a water chiller, which cools the water and recycles it through all the machines.

The remainder of the facility was raw material storage and finished product storage. There is no boiler on site.

## APPLICABLE RULES/PERMIT CONDITIONS

There are no air permits issued to the facility.

Plastic injection molding and resin handling are exempt per Rule 286(b); plastic injection, compression, and transfer molding equipment and associated plastic resin handling, storage, and drying equipment.

Since the mold release agent is applied using hand-held aerosol spray cans, use of the material should be exempt per Rule 285(2)(hh). Rule 290(2)(a) may also be applicable: cans are purchased in 16-oz. quantities. Assuming 300 cans are used per year which is the equivalent of 4800 ounces or 300 pounds. As the mixture is 100% volatile, the facility releases approximately 300 pounds per year of VOC's, uncontrolled, which would be in compliance with Rule 290(2)(a).

### FINAL COMPLIANCE DETERMINATION:

All processes at the facility appear to be e	exempt from air permitting r	equirements. /	At the time of inspection, Lear-
Taylor Plant was determined to be in com	pliance with all applicable :	state and feder	ral regulations.
NAME other	DATE 9-27-17	SUPERVISOR	_lK