

M4505
MAWILA

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

M450532736

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| FACILITY: AWTEC | | SRN / ID: M4505 |
| LOCATION: 14920 KEEL STREET, PLYMOUTH | | DISTRICT: Detroit |
| CITY: PLYMOUTH | | COUNTY: WAYNE |
| CONTACT: Dave Toeppe , Assistant Quality Manager | | ACTIVITY DATE: 11/13/2015 |
| STAFF: Usama Amer | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Targeted Inspection of an Opt-out Source | | |
| RESOLVED COMPLAINTS: | | |

On November 13, 2015, I conducted a targeted inspection of AWTEC, located at 14920 Keel Street, Plymouth, Wayne County. The purpose of this inspection was to determine the facility's compliance with the state and federal air quality regulations as well as the conditions of Permit to Install (PTI) No. 354-05. Mr. David Toeppe, Assistant Quality Manager, and Ms. Kathy Alkire, Quality/Environmental Coordinator, represented AWTEC during the inspection.

BACKGROUND

AWTEC is located in a light industrial area, operates Monday through Friday from 7:00 a.m. to 3:30 p.m. They employ approximately 240 people. The facility remanufactures automatic transmissions for both domestic and foreign automakers. The used transmissions are received from dealers, disassembled, cleaned, painted, reassembled, and tested. The remanufacturing operations take place in two main buildings. These two buildings are referred to as AWTEC East (KSE) and AWTEC West (KSW). Both buildings are owned by the same parent company (AISIN Inc.). They are located on adjacent properties; therefore, they are considered one stationary source. KSE, located at 14920 Keel Street, is a 75,500 square foot facility that has been at this location since January 1988. KSW is a 106,300 square foot facility located across the street, at 14933 Keel Street, and was established in 2003 with one coating line. The rest of the space at KSW is mainly used for storage, shipping and receiving. There is also a warehouse on Cleat Street in the same industrial park. Initially, AWTEC remanufactured Aisin AW transmissions used in Toyota vehicles, but currently they serve different OE customers including Volvo, Saab, Hyundai, Nissan, Ford, GM, Mazda and other auto manufacturers.

COMPLIANCE HISTORY

According to the previous AQD inspection reports, the original operations at AWTEC were regulated by a Wayne County air quality permit, which was issued in 1988 and voided in 2006, for a paint spray booth. In 2005, a self-initiated inspection was conducted by AQD. Consequently, the facility was determined to be a Title V major source for Hazardous Air Pollutants (HAP's). Because AWTEC had not submitted a ROP application within 12 months of commencing operation as a major source, AWTEC was referred to AQD Enforcement Section and entered into a consent order (AQD No. 16-2006). In January, 2006, AWTEC obtained a synthetic minor permit (PTI No. 354-05). Consent Order No. 16-2006 was terminated on June 8, 2009.

PROCESS DESCRIPTION

AWTEC's operations are divided into the following seven lines:

- A1: High Volume Line
- A2: Front Engine Front Wheel Drive
- A3: Truck line
- A4: Rework Line (not a production line at this time)
- A5: Front Engine Front Wheel Drive
- A6: Volvo line
- A7: Front Engine Rear Wheel Drive (located at KSW).

A detailed description of the unit operations of AWTEC was featured in AQD's Inspection Report No. M450518337 of June 21, 2012.

COMPLIANCE EVALUATION

PTI No. 354-05 is an Opt-Out Permit for HAP's. The permit special conditions are paraphrased for brevity.

FGFACILITY

DISCRIPTION: All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.

CONTROL EQUIPMENT: NA

Condition 1.1a: In Compliance.

Each individual HAP emission is less than 9 tons per year, based on a 12-month rolling time period as determined at the end of each calendar month.

- Xylene is the mostly emitted HAP:

- The maximum emission rate of 31.85 lbs was reported for 10/15 from the Black FAD (Fast Air Drying) Paint.
- The maximum emission rate of 125.10 lbs was reported for 4, 8 & 10/15 from the Black Aluminum Non Leafing Paint.
- The maximum emission rate of 9.54 lbs was reported for 9/15 from the thinning solvent.

- Ethyl Benzene is the second most emitted HAP:

- The maximum emission rate of 7.43 lbs was reported for 10/15 from the Black FAD Paint.
- The maximum emission rate of 23.85 lbs was reported for 4, 8 & 10/15 from the Black Aluminum Non Leafing Paint.
- The maximum emission rate of 4.15 lbs was reported for 9/15 from the thinning solvent.

Attachment A

Condition 1.1b: In Compliance.

Emissions of aggregate HAP's are less than 22.5 tons per year, based on a 12-month rolling time period as determined at the end of each calendar month.

- Aggregate HAP's maximum emission rate of 1,154.95 lbs (0.58 tons) was reported for 1/15, based on a 12-month rolling time period as determined at the end of each calendar month.

Attachment A

Condition 1.2: In Compliance.

AWTEC shall determine HAP content of each material as received and as applied using manufacturer's formulation data.

HAP containing paint is sometimes thinned with a small amount of Xylene. Xylene is primarily added to the black paint at a rate of 1/2 cup to 1 cup, as needed to thin the paint. The paint comes in five gallon pails, but each 5 gallon pail does not necessarily get xylene added to it. Xylene usage is recorded and tracked separately from paint usage. HAP content of each material as received is indicated on attached Material Safety Data Sheets (MSDS). Attachment A

Condition 1.3: In compliance. Attachment A

AWTEC shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month.

- Data reported in Attachment A show compliance with the above requirement.

Condition 1.4: In compliance. Attachment A

AWTEC shall keep records of the following:

- a. Gallons or pounds of HAPs used
- b. Gallons or pounds reclaimed. N/A

- c. HAP content, in pounds/gal, of each HAP containing material
- d. Individual and aggregate HAP emission calculations on the monthly basis
- e. Individual and aggregate HAP emission calculations on a 12 month rolling time period basis

- Data reported in Attachment A show compliance with the above requirements.

PERMIT TO INSTALL EXEMPT EQUIPMENT

A detailed description of the PTI Exempt Equipment at AWTEC was featured in AQD's Inspection Report No. M450518337 of June 21, 2012.

Basically, only the following 3 exempted Emission Units were evaluated from AWTEC's 2014 MAERS:

1) EU-Paint: 4 exempt automatic transmission paint line booths- Exemption R 336.1287(c)

- Total VOC Annual Emissions = 1.19 tpy - Attachment B

2) EU-Purge: 3 Paint gun cleaning Units use only Acetone, which is VOC exempt per R 336.122(f)(xiii).

3) EUV/BTester: 2 solenoid tester machines and two Valve Body Tester machines vented through the roof using hydraulics and automatic transmission fluid to check functionality - Exemption R 336.1283

- Total VOC Annual Emissions = 0.88 tpy - Attachment C

MAERS REPORT REVIEW:

Facility submitted MAERS for reporting year 2014. The report was complete and submitted in a timely manner. MAERS report was audited and approved by the AQD staff on 5/29/2015.

CONCLUSION:

At this time, AWTEC appears to be in compliance with federal and state regulations.

NAME Sam Amer DATE 12/30/15 SUPERVISOR JK