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

N085224020

FACILITY: WALBRO ENGINE MANAGEMENT CORP		SRN / ID: N0852
LOCATION: 6242 GARFIELD ST, CASS CITY		DISTRICT: Saginaw Bay
CITY: CASS CITY		COUNTY: TUSCOLA
CONTACT: Ken Lowe , Manufacturing Engineer 2		ACTIVITY DATE: 12/17/2013
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

I met with Ken Lowe, Manufacturing Engineer 2, for Walbro Engine Management LLC (Walbro) on Tuesday, December 17, 2013 approximately 1:00 p.m. for a self-initiated inspection.

Walbro manufactures and assembles a range of parts for small engines, such as boat motors and lawn mowers. They test fuel pumps and also manufacture plastic gas tanks for equipment such as weed whips and snowmobiles. The plastic gas tanks are made using plastic blow molding equipment using air as the blowing gas, which is exempt under Rule 286 (c) (i). A portion of the plant also uses die casting machines, which are exempt under Rule 285 (l) (ii). No recordkeeping is required with these exemptions.

Walbro holds seven active permits with AQD. Mr. Lowe provided me with a tour of the emission units permitted at the facility.

PTI 1024-84A is for a washer/dryer (cold cleaner) and a deburring unit. The cold cleaner had been replaced since the PTI was approved in 1985. This unit is exempt from obtaining a permit under 281(h); the air vapor interface is 9 square feet. The equipment was not in operation at the time of my inspection.

PTI 605-84A is for an Autoclave Impregnation System. The autoclave is used to apply sealant into depressions or cavities on parts. Parts are placed into the autoclave and the lid is locked shut. Negative pressure is applied to remove air from the void spaces, sealant is pumped into the autoclave to fill the void spaces, and then centrifugal force is applied to remove excess fluid. Once this process is done the parts are removed and placed into a cold rinse, then a hot rinse, which hardens the sealant. Recordkeeping (see attachments) specified in Special Condition number 17 were provided through email on January 2, 2014 and emissions were under the emission rate of 0.83 TPY listed in the permit requirements.
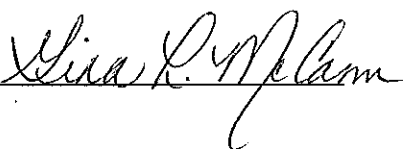
PTI 477-85 is for a Dichromate Plating line. The hexavalent chromium plating line has several baths used to deposit chromium on metal. First the part is dipped into Ridoline 53 (alkaline cleaning), rinsed in three separate water baths, then dipped in either Alodine 1500 or Alodine 600 (chromium electroplating), and lastly rinsed in water. Process complied with PTI 477-85 conditions. Again, an email was sent to Mr. Lowe on January 2, 2014 with NESHAP WWWWWWW requirements (see attached email). I also sent an email on February 15, 2013 in regard to the facility being subject to this standard. I have provided Mr. Lowe with a fact sheet and an example of an initial notification form. The MDEQ-AQD has not been delegated authority of this area source MACT therefore I did not evaluate for compliance. I will be referring to EPA.

PTI 867-91 is for the fuel system and solvent room, PTI 476-85 is for the waste water treatment system and requirements for these permits were met.
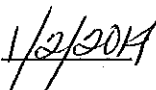
PTI 435-86 is for an Air Stripper that has not been used in several years and was left in place as part of a contingency plan, but chances are the equipment will not be able to operate if needed (per RRD). Equipment is still on site and could potentially be used; therefore the permit remains active.

PTI 868-91 is for an epoxy-accumulator process. Special condition 17 requires that a separate record for each calendar day and month of the usage rate of each resin and hardener used for the process is kept. Further, VOC per gallon of resin and hardener, the density of the VOC portion (minus water) of the resin and hardener be kept on file for a period of at least two years. At the time of my inspection the facility was in compliance with the requirements of this condition.

NAME _Gina R. McCann_ DATE _1/2/2014_ SUPERVISOR _C. Hill_