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

N141348368

FACILITY: DENSO Manufacturing North Carolina Michigan Plant		**SRN / ID:** N1413
LOCATION: 500 FRITZ-KEIPER BLVD., BATTLE CREEK		**DISTRICT:** Kalamazoo
CITY: BATTLE CREEK		**COUNTY:** CALHOUN
CONTACT: Matt Dunklee , HR Safety and Environmental Specialist		**ACTIVITY DATE:** 03/07/2019
STAFF: Amanda Chapel	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

On March 7, 2018, Amanda Chapel (staff) from AQD went to perform an unannounced air quality inspection at ASMO Manufacturing (facility) located in Battle Creek, Calhoun County. The purpose of the inspection was to determine the facility's compliance with permit to install (PTI) 350-80 for a FGFACILITY limit to restrict VOC emissions and isopropyl alcohol (IPA) use and all applicable state and federal air regulations. The following will summarize plant operations and facility's compliance status.

I arrived at the facility around 9:40 am. I drove around the front of the building and did not detect any odors or see any visible emissions from any points at the facility. I entered the facility and informed the receptionist that I was with the Department of Environmental Quality Air Quality Division and was there to do an unannounced air quality inspection. I provided her with a business card, and she paged Mr. Matt Dunklee, Human Resources Safety and Environmental Manager. When Mr. Dunklee came out, I introduced myself and said I was there to complete an inspection and asked if there was any place we could sit down and have our pre-inspection discussion. The last inspection occurred on 7/21/15 and the facility was not in compliance due to the pollution control equipment in the regrind room venting outside without the proper fabric filters.

The facility manufactures automotive windshield washer tanks and assembles tanks with hoses, pumps, sensors, and servo motors for several automakers, both foreign and domestic. They also assemble the servo-motors at the facility for dispersal of windshield wiper fluid as well as seat adjustment, air flow controls, sunroof controls, and other uses. The facility has about 300 employees who would three shifts per day five days per week and occasionally Saturday.

I asked Mr. Dunklee if there had been any changes since the last inspection. He said there were no major changes to the operation at the facility, but they did install a small, natural gas generator to keep power to the server rooms in case of an emergency. He also mentioned that ASMO will be changing names since its been acquired by Denso Manufacturing. Their new name will be Denso Manufacturing North Carolina, Michigan Facility. There was discussion about why the facility was not being rolled into the Denso Manufacturing ROP and he said they are not answering to the same corporate manager and therefore are not the same source.

He stated there were no boilers or cold cleaners on site. I asked him about a larger generator that he mentioned being discussed for installation at the last inspection. He said there was still a possibility the generator would be installed but no concrete plans as of now. If it does get installed and is over 10,000,000 Btu/hr, it will need a permit and likely be subject to 40 CFR Part 63 Subpart ZZZZ and Part 60 subpart IIII. There are about 8, natural gas fired space heaters that are used for building heat. These are exempt per Rule 282(2)(b)(i).

Mr. Dunklee gave me a tour of the facility. The first stop was the regrind room. This was the area of the inspection that was not compliant at the time of the last inspection. The regrind room, injection molding and blow molding scrap is ground, in separate machines, and sent to the appropriate mixer and then is used with virgin scrap in the machines. Based on the last inspection, the cyclone for the injection molding machine was vented externally. Now, the cyclone is hooked up to a baghouse to filter out the small, unusable pieces, and is vented internally. This is exempt per Rule285(2)(l)(v)(B). The is an air intake fan to help bring in fresh air to the room. There is an unused baghouse as part of the blow molding regrind area which will be removed.

Outside of the regrind room there is one blow molding machine with a dedicated cyclone and small baghouse which sends the usable particles into the regrind room to be mixed. The facility has 18 blow molding machines which use atmospheric air and associated storage of polypropylene (PP) and

polyethylene (PE) which is exempt per Rule 286(2)(c). There is one dedicated regrind machine per each two blow molding machines. Mold release and mold cleaner is sometimes used on the blow and injection molding machines and this is tracked under the FGFACILITY limit.

The blow washing area uses the IPA as a lubricant along with solvent on the stamp pads to allow for strong fusion of the parts to the molds. This is all tracked by the facility in their records. In the servo motor area, there are 11 injection molding machines. All plastic injection molding machines and any associated PP and PE storage is exempt per Rule 286(2)(b). These injection molding machines are all autonomous and make the parts without much assistance from the employees. The servo module department has two injection molding machines similar to the servo motor area.

The hose department also uses a small amount of IPA as lubricant. The next area we visited was BT-17 which has 4 injection molding machines which makes the casings for the motors. These are assembled by a fully automated line.

In the injection molding area, there are 9 injection molding machines. Here, small tampo printers are used to make small marks on parts as labeling. There are about 10 printers in this area. The printers are exempt under Rule 285(2)(l)(ix). Similar to the operations in the blow washing area, the machine completes the part which is then heated and pressed together to seal it. The hoses, motors, gaskets etc are added using IPA and other materials and then packaged.

The recycling department keeps the plastic which cannot be recycled in plant, separated. It is shipped off site and recycled by a third party. The spray booth on site only uses aerosol cans to touch up machinery in the building. This is exempt under Rule 287(2)(b). The amount of paint used in the booth is tracked for amount used. There are no VOCs in the paint, and it is not included in the VOC calculations. The filters are changed on a preventative maintenance schedule, quarterly. Also, in the maintenance area is a small welding operation which is vented externally. This is exempt per Rule 285(2)(i).

There is a cooling tower system associated with the plastic molding equipment does not use any chromium based water treatment chemicals (SDS attached) which could make the facility subject to 40 CFR Part 63, subpart Q. The cooling tower process equipment is exempt per Rule 280(2)(d). We also walked around outside and took a look at the installed Generac Industrial generator. We did not see any plate identifying the size of the generator, so I asked Mr. Dunklee to provide information on the generator via email.

Once we completed the walkthrough, we returned back to the conference room to do a records review to determine compliance with PTI 350-08. Based on the records provided by the facility, they used about 4.31 gallons of paint last year. The highest month of usage was October 2018 which used 1.22 gallons. The permit limits the facility to below 40 tons per year with a 12-month rolling average. In calendar year 2018, the facility emitted 5.56 tons of VOC, well below the permit limit. The highest year of emissions was 2013 when they emitted 20.43 tons. The permit also limits the facility to 80,000 pounds of IPA per 12-month rolling time period. In 2018, the facility used 10,098 pounds of IPA, well below the 80,000-pound limit. Records are also attached to the report.

I thanked Mr. Dunklee for taking the time to show me around the facility. I left around 12:20 pm. Based on the records provided and observations during the walk through, the facility appears to be in compliance with the permit to install and all other air quality regulations.

NAME [signature] DATE 4/8/19 SUPERVISOR RLH 4/15/19