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

N202229412

FACILITY: Williamston Products		**SRN / ID:** N2022
LOCATION: 615 DELANEY RD, OWOSSO		**DISTRICT:** Lansing
CITY: OWOSSO		**COUNTY:** SHIAWASSEE
CONTACT: Justin Bukovick , Manufacturing Engineer		**ACTIVITY DATE:** 05/13/2015
STAFF: Nathaniel Hude	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:**
SUBJECT: Exempt Facility under 287(C)		
RESOLVED COMPLAINTS:		

Inspection Report
N2022- Williamston Products Inc. (WPI)
615 Delaney Road, Owosso, Michigan

Inspection Date:
5/13/15

Facility Contacts: MACES Contacts were updated
Justin Bukovick – jbukovick@wpius.com
Duane Caulkins – duane@wpius.com
Frank Pulver – frankp@wpius.com
Jim Minkwic – jminkwic@wpius.com

MDEQ AQD Personnel:
Nathan Hude – 517-284-6779, huden@michigan.gov

Facility Description:
Formerly DBM Technologies, yet purchase around 2008, Williamston Products Inc. is a facility that assembles automobile interior trim. Current customers are GM and Chrysler. Trim products consist of door arm rests, dash instrument covers, storage compartment covers and the like. At one time the site had injection mold machines, yet currently only performs assembling via adhesive spray, adhesive tape, sonic weld, and heat. The plastic is shipped to Owosso from their Spring Lake facility, foam from their Williamston facility, and assembled in Owosso where they apply fabric or vinyl covering that is cut to spec in Mexico. The assembly is all completed by hand.

The work 2 8 hour shifts per day 5-6 days per week depending on work load and employ approximately 137 personnel.

There is one spray adhesive booth that is used for certain components with fabric filters and vented to the outside ambient air. They track adhesive use in grams with a maximum use of 1.75 gallons on 4/30/15 identified through records review.

Applicable Regulations:
None at current production rate

Key Concerns:
None

Emission Unit Summary Table
None.

Inspection Summary
I arrived onsite at 0900 for an internally scheduled yet unannounced inspection. This was also an initial contact as the facilities new Air Inspector. I did not notice any odors or visual environmental concerns of the WPI facility.

I entered the facility, signed-in and picked up a phone that rang to a receptionist. I identified myself and explained the purpose of my visit before asking for Jim Hunt or Kristen Hillman. I was informed they were no longer with the company, but she would find someone to help me. Shortly thereafter Jim Minkwic met me and

escorted me into the office area. He introduced me to Justin Bukovick as the individual to assist me in my inspection. We went into a conference room where we were joined by Frank Pulver and Duane Caulkins. I provided them with a copy of the Environmental Inspections brochure and reviewed it with them stating the purpose of why I was present. We reviewed the facility description and production as written above before taking a tour of the production area.

On the floor, they assemble different products at different stations using methods identified above and staples by use of air guns. All presses and processing equipment are exempt from permitting as per rule 286(b). The tour consisted start to finish of many products. Based on current orders and capabilities, they are able to produce Chrysler 300 and Dodge Charger armrests for the four door versions at a rate of 750 vehicles/day and two door versions at a rate of 300 vehicles/day; in addition to many other products for other vehicles.

We viewed the spray booth which is used for applying adhesive to vinyl coverings. The adhesive is shipped in 5 gallon buckets, they had 8 buckets in stock. The adhesive is mixed with an activator, applied to the vinyl by air gun and is then allowed to dry in a 88°F type of desiccator. Following drying, the vinyl is then stretched over plastic and a handheld heat gun is used to bind the vinyl and plastic followed by bladder wrapping and staples. The spray booth has a manual control ventilation fan that when operated provided an estimated facial velocity of over 200 fpm. A records review of the booth showed applications intermittently throughout the months recorded; 2 times in February, 3 times in March, 4 times in April, and 9 times thus far in May. The highest adhesive usage was recorded to be 7148 g on 4/30/15. I asked for a copy of the tracking log, which Justin provided for me.

We also toured the prototype cutting area, maintenance storage area, quality assurance area, and environmental test chamber (for heat and humidity specifications) area where I found no concerns.

Upon completion of the tour, Justin, Frank, Duane and I conducted an out brief. I was provided with the MSDS sheets for the adhesive. The density of the adhesive is 8.96lbs/gal. Using the highest daily use of 7148g, this equates to 1.76 gallons. I informed them I was concerned of whether exemption 287 (a) which allows 2 gallons/day application rate for an adhesive coating line or 287 (c) which allows for 200 gallons a month on a surface coating line applied to their operation. Frank informed me that they had attended the PTI class put on by the DEQ and from his discussions with others (a) applied. I told them that I would contact my counterparts to ensure the correct exemption was being applied. I also asked that they continue the record documentation as done in the past for future inspections.

The overall facility was clean and the overall visit was cordial. I departed the site at approximately 1035.

Upon returning to the office and discussing the production with my counterparts, we agreed that exemption 287 (c) best applies to the facility I notified the result of this discussion to WPI via email to Justin, Frank, and Duane.

Based on my inspection and follow-up, the WPI of Owosso was found to be in compliance and requires no further action.

NAME _____ DATE 5/14/15 SUPERVISOR _____