



DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N512951886

FACILITY: TRW	SRN / ID: N5129
LOCATION: 500 E VAN RIPER RD, FOWLerville	DISTRICT: Lansing
CITY: FOWLerville	COUNTY: LIVINGSTON
CONTACT: Daniel Stoscup , HSE Manager	ACTIVITY DATE: 12/20/2019
STAFF: Samantha Davis	COMPLIANCE STATUS: Compliance
	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection to determine compliance with air rules and regulations. Also, to verify the source of an odor complaint. It was determined that ZF Industries (TRW) was not the source of the odor.	
RESOLVED COMPLAINTS:	

**N5129 ZF Industries Inc. (formerly TRW)**

500 E. Van Riper Rd.  
Fowlerville, MI 48836

**Facility Contacts:**

Daniel Stoscup, HSE Manager, 517.223.6951, Daniel.stoscup@zf.com

**Facility Location Summary:**

Near exit 129 (Fowlerville Road) on I-96. The property is just North of I-96 (can see from the highway). Closest residence is over 1,000 ft away. Facility is set back off E. Van Riper Rd. over 500 feet. A few businesses to the immediate West, forested buffer to the immediate East, and small industrial area to the immediate North.

**Safety Equipment:**

Safety glasses, ear plugs, steel toe boots.

**Process Description & Overview:**

This facility was formerly known as TRW. In 2015 it was purchased by ZF Industries Inc. and the name officially changed in 2019.

ZF Industries Inc. manufactures anti-lock brake system (ABS) control systems, by machining aluminum castings, and then cleaning and assembling them.

ZF industries is a minor source because it does not have the Potential to Emit (PTE) to be a major source of criteria pollutants. This permits this facility used to hold were void in early 2000's and now ZF Industries operates their equipment under exemptions, which does not require them to obtain a Permit to Install of Rule 201.

**Inspection/Permit Discussion:**

Arrived on site at 9:38am. There were no odors or visible emissions other than steam. Upon arrival I learned that Gary Novak had retired, and that his replacement Daniel Stoscup, was at the Fenton location that day. Dan left the Fenton location to meet me at the Fowlerville facility, where we initially discussed the reason for my visit.

This inspection was part of a routine scheduled inspection for compliance. The last inspection at this facility was in 2013. The second reason for my visit, was to confirm the source of odor complaints received earlier that week and that day of musty odors. Back in 2013 this facility was having musty odor complaints. However, the problem was later resolved and now there is a monitor that measures the water temperature and pH 24/7 to ensure their processes are in the proper range to avoid bacterial activity. Following my visit, I determined that ZF Industries was not the source of the odor.

We took a walk around the facility and saw all the deburring equipment and aluminum machining

equipment operating. This facility no longer has any thermal deburring furnaces. All deburring units at this facility utilize water pressure. There is also no longer utilize ink marking lines to mark parts, they now use 4 laser machines. Each laser unit is equipped with filters.

The aluminum anodizing line was also in use at the time of my visit. This equipment is equipped with an in-line demister for pollution control and is vented out the stack. When this unit was first installed there was talk of using Rule 290, but it was determined by the company that they found it a better fit to use Rule 291 to exempt this line from needing a permit. Emission demonstrations provided to me can be found attached to this report, along with correspondence from Dan stating the exemption being used.

#### **Emission Units and Applicable Regulations:**

- Aluminum machining processes with water-based cooling solutions with dust collectors, Exempt 285(2)(l)(vi)
  - o These units take aluminum blocks, and machine holes in them. These machines are routed to dust collectors and exhaust to the in-plant environment. Scrap aluminum is recycled.
- Rock parts washers, Exempt 285(2)(l)(iii)
  - o The rock parts washers uses an aqueous solutions that is mostly made up of water.
- Detergent parts washer, Exempt 285(2)(l)(iii)
- Aluminum anodizing line, 291(2)
  - o This line is used to plate the inside of metal parts. This unit is vented out of doors through the stack and is equipped with an in-line demister used to control emissions. PTE calcs done on this unit show that uncontrolled sulfuric acid emissions would reach a max of 1.65 lbs/month or 0.0099 tons/year. The emission limit for sulfuric acid mist in exemption Rule 291 is 0.12 tons/year, therefore this anodizing line is below the emission limit and exempt from Rule 201. The PTE calculations for the aluminum anodizing line can be found attached to this report.

Based on the information provided to me, it appears that ZF Industries is in compliance with state air quality regulations.

NAME Samartha Dwis

DATE 2/5/2020

SUPERVISOR B.M.