

Cody ✓

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N625070471

FACILITY: EATON Corp. Mirror Controls Div.		SRN / ID: N6250
LOCATION: 1100 W BROADWAY, THREE RIVERS		DISTRICT: Kalamazoo
CITY: THREE RIVERS		COUNTY: SAINT JOSEPH
CONTACT: Shawn Hoffmaster , Maintance Manager		ACTIVITY DATE: 01/10/2024
STAFF: Jared Edgerton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced facility inspection.		
RESOLVED COMPLAINTS:		

On January 10, 2024 Air Quality Division (AQD) staff (Jared Edgerton and Cody Yazzie) arrived at 1100 W Broadway St, Three Rivers Michigan at 10:20 AM to conduct an unannounced air quality inspection at now Precision Wire Forms. Staff met with Shawn Hoffmaster, Maintenance Manager. He is the onsite contact for this facility, and he answered all operation questions.

This facility is operated by 90 to 100 staff members, on two shifts (1st and 2nd) Monday through Friday. This facility produces bent wire forms in various shapes. Raw materials come into the facility on wounded spools and made up of cold rolled metals. The metal is then bent into many different forms by CNC (computer numerical controllers) machines to the desired forms. The brand of these bending machines is Wafios. Some products require welding and assembly to be completed. Precision Wire has 28 robotic welders that are used to put different wire forms together, and the type of welding being used is MIG (metal inert gas) and resistance spot welding (RSW). These final products will mainly be used in automotive seating (structural frames and bolsters), as well as lock rods, strikers for doors, head rests, arm rests, and towel bars.

This is the first time that this facility has been inspected by AQD staff, as operation started in August 2011. AQD staff conducted an inspection at this location in 2010 when the building was owned by Eaton Corp. Mirror Controls Division. Eaton sold the building to Precision Wire in 2011. During the 2010 inspection, it was stated that Eaton was moving all assets to North Carolina. Eaton did have an air permit issued in 1997 for a grease process that involved a dip tank, and an air flow oven. This permit was voided by AQD in 2003 but there is no indication that previous staff had ever investigated that the actual process was removed. In the 2010 inspection report it was also stated that there was an exempt quality test lab in the facility with 15 hoods. These hoods vent through a filter to the ambient outside air. Even though the permit was voided in 2003, the purpose of this inspection was to verify that permitted equipment was removed from the facility. Secondly, the inspection was conducted to also see what the new operation practices were at Precision Wire Forms.

Staff asked, and Mr. Hoffmaster stated that there are no emergency generators or cold cleaners. The staff did find one cold cleaner in the tool area of the facility. The lid was down and stays down when the cleaner isn't being used. The cleaner had operational instructions on the inside part of the lid, but staff also gave the facility an EGLE approved instruction sticker to be placed on the outside part of the lid. Mr. Hoffmaster provided a tour of the facility, and the findings of the inspection are summarized below.

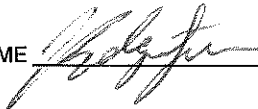
Inspection:

The inspection started within the resistance spot welding area of the facility, and then moved to the Mig welding. All welding at the facility is done by robotic arms. There is one TIG (Tungsten Insert Gas) welder, but it is rarely used. Staff was then guided into the hooded welding room. There are 9 hooded welders in the room, and all air around the welders is filtered before being released outside to the ambient air. This room appears to be where Eaton had its quality test tab. Staff observed only 9 hoods, and not 15. Coating of parts if needed, is contracted out by a different company. No coating of parts occurs currently. Staff then moved into the metal bending area of the facility. Multiple machines are located here and are primarily controlled by computer programs. The staff then moved towards a small assembly area for the head. Staff requested to see the tool room, which was the last location seen by staff. The cold cleaner was located within this area and is serviced by Crystal Clean. Staff requested to see the MSDS for the solvent used in the cleaner. The MSDS was sent by email to staff to review. This concluded the tour of the facility, and it appears to staff that all previous permitted equipment has been removed from the building. 9 Hoods do still operate, but they do so under exemption.

Conclusion of Inspection:

At the time of the inspection, based on what was seen during the walk-through, all equipment used within the facility operates under exemptions. The welding machines as well as the hooded ones are exempt under Rule 336.1285(2)(i). The bending machines in the facility are exempt under Rule 336.1285(2)(l)(i). There is no requirement for record keeping with these exemptions, and the facility appears to be in compliance. Staff concluded the inspection at 11:30 AM. -JLE

NAME



DATE

1/11/24

SUPERVISOR

