

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

N713834210

|   |                    |                           |
|---|--------------------|---------------------------|
| FACILITY: Demmer Corporation  |                    | SRN / ID: N7138           |
| LOCATION: 16325 Felton Road, LANSING  |                    | DISTRICT: Lansing         |
| CITY: LANSING   |                    | COUNTY: CLINTON           |
| CONTACT: Walter Larry , Maintenance Manager   |                    | ACTIVITY DATE: 04/07/2016 |
| STAFF: Julie Brunner  | COMPLIANCE STATUS: | SOURCE CLASS: MINOR       |
| SUBJECT: Scheduled inspection of Demmer Corp. Demmer has leased the facility to Kirchoff Van-Rob. |                    |                           |
| RESOLVED COMPLAINTS:  |                    |                           |

On April 7, 2016, I conducted an unannounced, scheduled inspection of Van-Rob (location of a former Demmer Corporation) located at 16325 Felton Road in Lansing. An inspection was last attempted on December 13, 2013. The building was empty with a "For Lease" sign when the last inspection was attempted and is now occupied by Van-Rob.

**Contacts:**

Larry Walter, Maintenance Mgr., 517-301-0519, lwalter@van-rob.com

Mandie Mowatt, HR for Van-Rob

**Facility Description:**

Van-Rob is leasing the building from Demmer Corporation. At the Felton Road facility, they assemble metal parts for automotive applications. They are a parts supplier to GM. The facility is located off of West Grand River Avenue on the northwest side of Lansing in a commercial and light industrial area. The Royal Scott Golf Course, Chapel Hill Memorial Gardens and Capital Regional International Airport are located just east of the facility on West Grand River Avenue.

**Inspection:**

I arrived at 2:03 PM. The weather was 37°F rain/snow, and overcast. I was met by Ms. Mandie Mowatt who contacted Mr. Larry Walter. I briefly discussed the purpose of my visit including an overview of the inspection process and provided the "Environmental Inspections" brochure. After a safety orientation, Mr. Walter and I toured the operations.

Van-Rob assembles and produces aluminum and steel metal parts for the Chevy Camaro. They receive the metal components from their suppliers, and weld and glue the components to make the substructure of the Camaro (wheel house, rocker, etc.). There is no metal stamping in the plant. Production started in October of 2015. At the time of the inspection, Van-Rob had 146 employees including office staff, and was operating 3 shifts per day.

There is no coating of parts in the process. The coating line permitted on PTI 145-08 which was issued to Demmer Corporation at that location has been removed. PTI 145-08 can be voided.

We started the tour at the incoming metal components on storage shelves. From there, the aluminum and steel components go to resistance and MIG welding areas for assembly. Welding is exempt from the requirement to obtain a permit under Rule 285(i).

The area "Cross Car Beam" was operating and consists of six (6) robotic MIG welders in two (2) automated booths for welding of aluminum components. The booths vent to an air scrubber that consists of an electric filter and two (2) particulate filters. Filters are emptied monthly. The air ventilation system vents out the roof approximately at a height of approximately six (6) feet above the roof. The roof is 26 feet at the peak and 25 foot on the edges. The stack has some kind of a cap (picture attached to inspection report).

The area for resistance welding of steel components was viewed next. The area is vented inside with no external vents. Glue adhesive used for assembly is a paste (no spray application). There are three (3) types of adhesive used, one (1) black and two (2) purple colors. Three (3) SDS were obtained for the adhesive and are attached to the file copy of this report. The adhesives have a short shelf life (~3 months) and when expired they are sent out to the waste hauler (ERG environmental systems). There

were 24 – 55 gallon drums sent out on April 7, 2016 according to a waste manifest that was provided. The drums were empty to ½ full, but the volume of waste sent out is not quantified. Usage of adhesive was estimated at 3 - 55 gallons of purple adhesive every 2 weeks and less than 55 gallons of black adhesive per month. At least two drums for adhesive application were viewed on the floor but the number of application areas may be more.

There is a water treatment system for cooling water used by the robots. Water is provided by a municipal provider (LBWL). The facility adds biocides because the water tanks can get warm causing bacterial growth.

The rest of the facility is warehouse space, and a small maintenance shop.

Van-Rob is currently installing new cells of robotic welders for a new product line. The Chevy Traverse is coming in April. Sixty (66) more robotic welders will be added along with approximately ten (10) more employees per shift. The plan is to have installation complete and start production in July of 2016.

The facility currently has 145,000 square feet of floor space and is expanding into the business space next door for the new product line.

**Facility Heat** - Facility heat is provided by LBWL. No equipment for generation of energy, such as boilers, are on site.

**Emergency Generators** - There are no emergency generators currently installed at the facility. A Generac generator is in a box on the shelf. The generator is more a residential sized generator, and is to satisfy the requirements of GM. Mr. Walters was not sure if the generator would be installed.

After a discussion with Mr. Walter about my tour and possible exemptions, I left the facility at 3:00 PM.

**Follow-up - Adhesive Application Areas Exemption:**

If the glue application areas are not vented to the outside air, then the following exemption rule could be used:

**Rule 287(a)** An adhesive coating line which has an application rate of less than 2 gallons per day and which has emissions that are released only into the general in-plant environment.

In order to use this exemption, records of adhesive usage would have to be kept on a daily basis for each line.

If this exemption does not work, then another exemption rule could be used such as:

**Rule 287(c)** A surface coating line if all of the following conditions are met:

- (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
- (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
- (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

If permit exemption Rule 287(c) were used, then the adhesive application areas would need ventilation systems that exhaust to the outdoor air. The records of adhesive usage would be kept monthly.

I viewed two - 55 gallon drums during the inspection but I was not sure if each welding cell had glue adhesive application. Do the 55 gallon drums feed adhesive more than one cell?

In an email response dated April 12, 2016 from Larry Walter – “And I am working on the adhesive questions. We are using it in 10 locations, I have my tech working on usage by cell and will have it to you before the end of the week, I do not believe any are over two gallons a day at any one cell.”

I followed up on April 25, 2016 but never received any records. Just based on the inspection observation

and responses received, it appears that Rule 287(a) could be used. Usage records will need to be kept by the facility.

Using the SDS information for the product "Teroson PV 1272 Anti-Flutter Adhesive" that was provided during the inspection, a worst-case volatile organic content (VOC) content of 0.3076 lb/gallon can be used to calculate potential to emit (PTE) as follows:

VOC PTE = 10 locations x 2 gals/day x 365 days/year x 0.3076 lb/gal x ton/2000 lb = 1.1 ton per year

A PTE of 1.1 ton per year (tpy) is below the significant threshold of 40 tpy for VOC allowing the use of an exemption, and below the 10 tpy threshold for reporting to the Michigan Air Emissions Reporting System (MAERS).

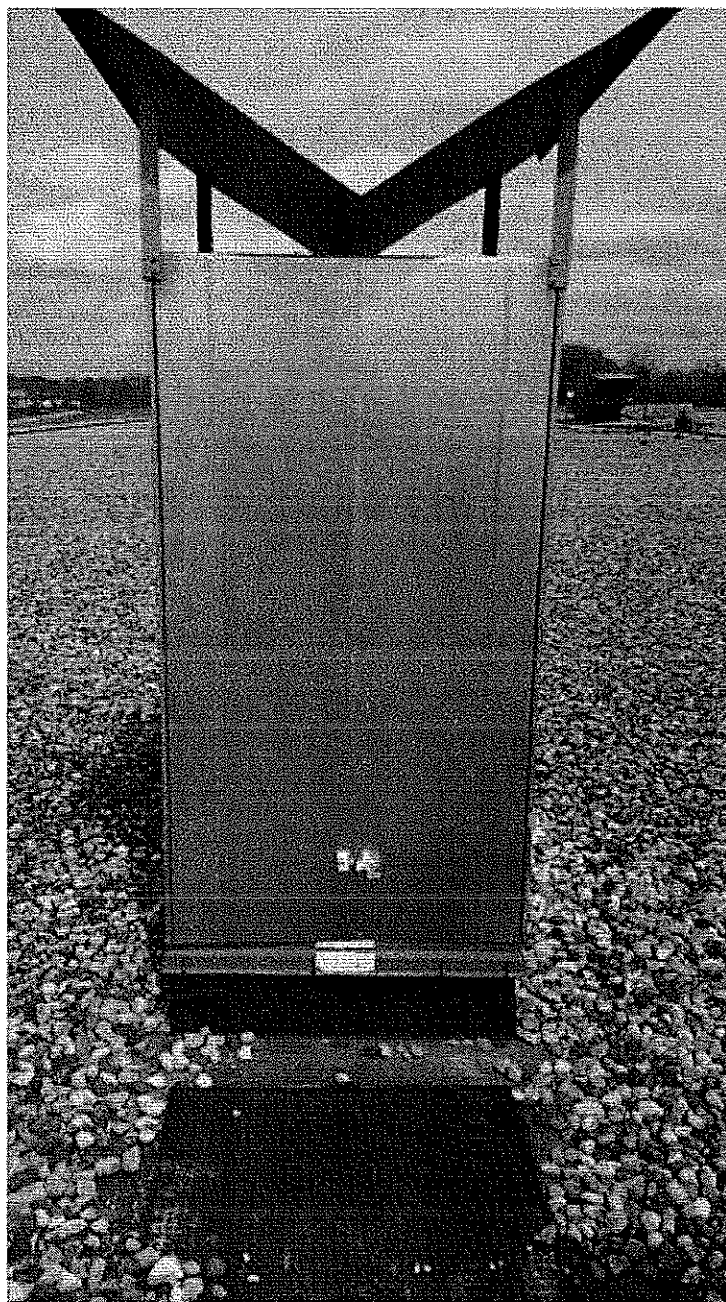
Summary and Regulatory Overview:

The facility appeared to be in compliance with the applicable rules and regulations.

Van-Rob is a true minor source of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program. Van-Rob appears to have all exempt processes.

The facility does not need to report emission information to MAERS.

I requested that PTI 145-08 be voided and that the paperwork be sent to Ms. Jane Johnson, Demmer Corporation, 1600 N. Larch, Lansing, MI 48906 on April 18, 2016.



**Image 1(Welding Stack) :** Welding Stack Vent

NAME Julie P. Bower

DATE 5/17/16

SUPERVISOR B. M.