

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

N826663689

<b>FACILITY:</b> Eberspaecher North America, Inc.		<b>SRN / ID:</b> N8266
<b>LOCATION:</b> 2035 ORNDORF DR, BRIGHTON		<b>DISTRICT:</b> Lansing
<b>CITY:</b> BRIGHTON		<b>COUNTY:</b> LIVINGSTON
<b>CONTACT:</b> Jerry Salame , HSE Coordinator		<b>ACTIVITY DATE:</b> 07/20/2022
<b>STAFF:</b> Daniel McGeen	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Unannounced, scheduled inspection of source last inspected in 2013.		
<b>RESOLVED COMPLAINTS:</b>		

On 7/20/2022, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced inspection of PUREM by Eberspacher, which was formerly called Eberspaecher North America, Inc., when inspected in 2013.

**Facility environmental contact:**

Jerry Salame, HSE Coordinator; 248-921-9917; [jerry.salame@purem.com](mailto:jerry.salame@purem.com)

**EGLE AQD contact:**

Dan McGeen, inspector; 517-648-7547; [mcgeend@michigan.gov](mailto:mcgeend@michigan.gov)

**Facility description:**

This facility manufactures vehicle exhaust systems for commercial and passenger vehicles, both domestic and international.

**Emission units\*:**

- 40-42 robotic weld cells for mig and tig welding; controlled by 4 shared baghouses (baghouses exhaust to plant interior); Rule 285(2)(i)
- 6 welding repair booths with the above 4 baghouses (baghouses exhaust to plant interior); Rule 285(2)(i)
- Baggouses for the above emission units; Rule 285(2)(f)

\*An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.

**Regulatory overview:**

PUREM by Eberspacher is classified as a minor source in the Michigan Air Compliance Enforcement System (MACES) database. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

This facility is considered a minor or *area source* for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

**Michigan Air Pollution Control (MAPC) Rule 201 requires a permit to install (PTI) for a process or process equipment which emits or may emit an air contaminant. There are numerous exemptions from the requirement to obtain, however.**

- MAPC Rule 285(2)(i) exempts brazing, soldering, welding, or plasma coating equipment.
- MAPC Rule 285(2)(f) exempts installation or construction of air pollution control equipment for an existing process or process equipment if the control equipment itself does not actually generate a significant amount of criteria air contaminants.

**The facility possesses 40-42 robotic mig and tig welding cells, and 6 welding repair booths, controlled by 4 Torit baghouse dust collectors.**

**Fee status:**

**This facility is not considered fee-subject, as it is not known to be a major source for criteria air pollutants, or for HAPs, nor is it subject to a federal New Source Performance Standard or a Maximum Achievable Control technology standard.**

**This facility is not required to report annual emissions through the Michigan Air Emission Reporting System (MAERS).**

**Location:**

**This facility is in a business park in Brighton. About 150 feet to the north is a large medical facility, while roughly 190 feet to the east is a middle school, as measured by me in Google Maps. About 390 feet to the southeast is an industry, and to the south and west is undeveloped land. The nearest residences are at an apartment complex, about 875 feet to the northwest.**

**Previous inspections:**

- 4/26/2013, no violations noted
- 4/16/2009, no violations noted

**Complaints:**

**None in the AQD's Michigan Air Compliance Enforcement System database, which goes back to 2007.**

**Safety apparel:**

**My recollection is that steel-toed boots, safety glasses with side shields, and hearing protection are required here.**

**Arrival:**

**As I arrived at 10:43 AM, it could be seen that there were no visible emissions from the factory. Weather conditions were partly sunny, hazy, and 85 degrees F, with winds out of the south or southwest at 20-25 miles per hour. I could not detect any odors in the parking lot.**

I met with Mr. Jerry Salame, HSE Coordinator. Ms. Kathy Gurnee, the former environmental contact, is doing a different role in the company now, as I understand it.

I was informed that in 2016, the plant underwent an expansion, and more mig and tig welding cells were installed, with more capacity added to the Torit cartridge collector baghouses, for particulate control.

#### Inspection:

I was informed that parts are made here, but no priming or painting is done here. Parts are sent offsite for painting, and then return for additional work.

We started with the 2016 expansion, where stuffing for catalytic converters for semi trucks is placed in shells. I observed a dust collector which serves the stuffing process. It exhausted indoors, and there were no visible emissions. This did not appear to require a permit to install.

I was shown that metal arrives in flat sheets, which are bent into cylindrical rolls, and the seams are welded. Some shells arrive pre-rolled for exhaust systems, I was informed. I did not see any visible emissions indoors from the welding units. The ductwork which serves each welder ties into a large overhead duct, which goes to large, shared baghouses.

As an example of one of their 4 baghouses, I was shown an extremely large Donaldson Torit dust collector, which had 9 hoppers leading to 9 drums, of 55 gallons each, to contain captured particulates. It had additional cartridge capacity added since my last inspection here. The lids were closed on each barrel, the ductwork was free of leaks, and there was no spillage. I was told a third party services their Torit collector system, but one plant employee here can do change outs. This Torit exhausts back into the in-plant atmosphere in 2 locations, and there were no visible emissions.

They do not do any soldering, I was informed. They purchase the wiring and plug it in. I observed assembly operations, which did not generate any visible emissions.

#### Departure:

I left the site at 11:45 AM. I could not detect any visible emissions or odors as I drove through parking lots east or north of the site. I left the Brighton area at this time.

#### Conclusion:

I could not identify any instances of noncompliance. Housekeeping at the plant appeared good.

NAME 

DATE 2/11/2023

SUPERVISOR RB