

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

P055348072

FACILITY: WINDSOR MACHINE & STAMPING US LTD		SRN / ID: P0553
LOCATION: 26655 NORTHLINE ROAD, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Mike Graf , Environmental Staff		ACTIVITY DATE: 03/08/2019
STAFF: Katherine Koster	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2019 Targeted Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection
INSPECTED BY: Katie Koster, AQD
PERSONNEL PRESENT: Kristen Padron, EHS Manager, Tim Head, Operations Manager
FACILITY PHONE NUMBER: (734) 941-7320
FACILITY FAX NUMBER: (734) 941-6208
FACILITY WEBSITE: windsormachine.com

FACILITY BACKGROUND

Windsor Machine and Stamping Ltd. (Windsor), an automotive component manufacturer, is located in an 80,000 square foot (ft²) facility at 26655 Northline Road, Taylor, Michigan. The facility is bordered by industrial and commercial property to the west and east. Residential property is located to the north and south. The nearest residential property is located approximately 400 feet to the northwest.

The facility operates 24 hours a day, 5 days a week and employs 266 people. The company moved into the building in 1994 and has completed two additions.

Windsor was issued permit to install (PTI) 151-14 on November 7, 2014 for the operation of a reaction injection molding (RIM) line. PTI 151-14 is a Title V Opt-Out permit by limiting volatile organic compound (VOC) emissions to less than 100 tons. The facility is also considered a synthetic minor for hazardous air pollutants (HAPs) because PTI 151-14 limits HAP emissions to less than 10 tons per year on an individual HAP basis and less than 25 tons per year on an aggregate HAP basis. Windsor was issued permit to install 151-14A on July 27, 2015, to add a second RIM line to their operations. Facility is still operating as an opt-out for VOC's and synthetic minor for HAPs.

PROCESS OVERVIEW

The facility operates two RIM lines used for making foam head rests for automotive applications. Note, the following is restated from the prior inspection report. Each RIM line consists of a series of 24 carriers with 41 tools with up to 2 molds per carrier, arranged on a circular carousel. There are four stations on the carousel. At the first station, a mold release agent is manually applied and sometimes a paste wax is manually applied. Particulate emissions are controlled by filters. At the second station, a mold release agent is sprayed into the mold using a robotic arm in a partially enclosed booth. At the third station, foam components (polyol and methylene diisocyanate [MDI]) are mixed together under high pressure in a mix head and then injected into the mold using a robot. The mold is then closed automatically and the reacted foam material expands in the mold forming the head rest. The mold line is electrically heated to 125 to 130 degrees Fahrenheit (°F). At the fourth station, the mold is opened and the part is removed.

The facility also operates machining and welding equipment for the manufacture of metal head rest parts. The facility operates five steel drawing lines, thirteen robotic welding stations, bending and forming stations, and five headrest assembly areas. These additional manufacturing areas are exempt from PTI requirements.

There are no generators (emergency or other) on site.

COMPLAINT/COMPLIANCE HISTORY

There have been no complaints for this facility.

The prior inspection occurred in 2015. At that time, the facility was determined to be in compliance.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VIOLATION NOTICES

None

INSPECTION NARRATIVE

On March 8, 2019, the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) inspector, Ms. Katie Koster conducted an inspection of Windsor Machine at 26655 Northline Road, Taylor, Michigan. I met with Ms. Kristen Padron, EHS and Mr. Tim Head, Operations Manager. Ms. Padron had only been with the company for two weeks. I also met Mr. Mike Grouse, Plant Manager. Ms. Padron and Mr. Head accompanied me about the facility. The inspection was conducted to determine the facility's compliance with the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55, and PTI 151-14A.

I stated the purpose and authority for the inspection to Ms. Padron and Mr. Head. During the opening meeting the facility operations and PTI conditions were discussed. The inspection began with observation of the RIM lines which were both in operation. At the time of the inspection the filters were in place and are reportedly changed out weekly. According the operator, the paste wax is applied as needed, but usually about once per week. Waste material observed appeared to be stored in closed containers.

We also viewed the steel drawing machines, robotic bending and forming stations, robotic welding, and assembly areas. Emissions from the drawing machines, assembly areas, and bending and forming stations are released to the general in-plant environment. Each robotic welding station is vented to outside ambient air through its own individual stack at roof level. The robotic welding is completed in a semi closed booth.

We wrapped up the inspection in a conference room. I reviewed the permit conditions and associated recordkeeping with the company and verbally stated the records I would like to obtain. I followed up with the attached email.

APPLICABLE RULES/PERMIT CONDITIONS

PTI 151-14A

PTI 151-14A was issued on July 27, 2015. After the inspection, facility was unable to provide any of the requested records in a timely manner. This was partially due to a change in environmental staff after the inspection. Records were requested several times. See attached emails. Some records were eventually received on May 1, 2019; however, staff was unable to fully review them and determine compliance before going on maternity leave on May 12, 2019. Based on a cursory review, it also appears that the required 12 month rolling emission data for HAPs and VOC's was not received. As such, non compliance was chosen for the compliance status. Facility will be revisited and inspected during FY2020.

FINAL COMPLIANCE DETERMINATION:

Non compliance was chosen due to failure of the facility to provide the requested records related to PTI 151-14A in a timely manner, and failure to provide all of the requested records; namely 12 month rolling emissions calculations.

NAME Katie Koster

DATE 12/23/19

SUPERVISOR W.M.