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

P088555311

FACILITY: WPI - Welders & Presses, Inc.		**SRN / ID:** P0885
LOCATION: 27295 Luckino Drive, CHESTERFIELD		**DISTRICT:** Warren
CITY: CHESTERFIELD		**COUNTY:** MACOMB
CONTACT:		**ACTIVITY DATE:** 08/25/2020
STAFF: Joe Forth	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: On-site Inspection		
RESOLVED COMPLAINTS:		

On August 25, 2020, AQD staff Joseph Forth conducted a scheduled targeted inspection at WPI-Welders & Presses, Inc. located at 27295 Luckino Street, Chesterfield, Michigan. The purpose of the inspection was to determine facility's compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and Permit to Install (PTI) No. 116-18A.

I arrived at 9:30 AM. I was met by Reid Vandekerkhove, Electrical Manager. I introduced and identified myself and stated the purpose of my visit.

WPI is a Tier II supplier for the automotive industry. Their operations mainly involve welding of the automotive parts and electrocoating. WPI currently has two electrocoating lines (PTI No. 116-18A), which Mr. Vandekerhove stated have had no changes since the last inspection. They have about 165 employees and operates 2 shifts (6:00 AM to 3:00 AM) per day, Monday through Friday. The facility has no cold cleaner, no solvent wipes nor paint spray booth. One back-up generator (with EPA certification) is located on the premises, the max heat input of the engine is 1,000,800 BTU/hr. This engine appears to be exempt from permitting per Rule 336.1285(2)(g).

The oven for electrocoating line (EU-E-Coatline-02) is 5 MMBT/hr. The facility has 3 boilers (750,000 BTU/hr, 2,000,000 BTU/hr, 3,980,000 BTU/Hr) to heat the tanks. The ovens and boilers appear to be exempt from permit to install requirement pursuant to Rule 285(2)(b)).

The facility has about 90 resistance welding stations (30 robots, 60 manual) and 10 Mig welding cells (9 robots, 1 manual). Three of these welding cells are vented to the atmosphere. One of them is vented due to welding of stainless-steel parts which may contain chrome. They also use soft steel (108-110 material) parts. The other two vented because there were existing exhausts in the area. The welding process is exempt from permit to install requirements pursuant to Rule 285(2)(i).

Compliance

All records were provided electronically and can be found in: S:\Air Quality Division\STAFF\Joe Forth\P0885 WPI FY20 Inspection

PTI No. 116-18A

FG-E-Coatlines

I.1 A VOC emission limit of 13.0 tons per year. From August 2019 to July 2020, WPI emitted 3.92 tons of VOC from FG-E-Coatlines.

II.1 A VOC material limit of 0.6 lb/gal (minus water as applied). The VOC Content of the resin is about 0.61 lb/gal and the paste is about 0.06 lb/gal. The resultant VOC content is about 0.55 lb/gal which is in compliance with the 0.60 lb/gal (minus water, as applied).

III.1 The permittee captures all waste materials and stores them in closed containers. The permittee shall dispose of all waste materials using a waste disposal service on an as needed basis.

III.2 The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. WPI appears to be properly handling all VOC containing materials, keeping containers closed when not currently being used.

V.1 AQD has not requested WPI do a Method 24 analysis on their coating because it is a water-based

coating. WPI instead uses manufacturer's data to determine the VOC content of the coating.

VI.1 The permittee appears to be keeping all required records in a satisfactory matter.

VI.2 The permittee keeps a current listing of all materials used in FG-E-Coatlines. Mr. Vandekerhove provided the SDSs for all materials electronically.

VI.3 The permittee appears to be keeping records of the following:

a) Gallons (with water) of each material used.

b) VOC content (minus water and with water) of each material as applied.

c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month. For instance, in July 2020 0.283 tons of VOC were emitted.

d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. From August 2019 to July 2020, WPI emitted 3.92 tons of VOC from FG-E-Coatlines.

VII. Mr. Vandekerhove stated that the rain caps for FG-E-Coatlines were removed last year, according to this the exhaust stacks for FG-E-Coatlines are unobstructed.

WPI appears to be in compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and Permit to Install (PTI) No. 116-18A.

NAME Joseph M Fuller DATE 9-28-2020 SUPERVISOR Sebastiang Kallumkal