## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated Inspection

Fy2016 Insp

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FACILITY: Eberspaecher North America, Inc	SRN / ID: U63120171
LOCATION: 30220 Oak Creek Dr., Wixom	DISTRICT: Southeast Michigan
CITY: Wixom	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 02/03/2016
STAFF: Iranna Konanahalli // COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2016 inspection of Eperspaecher North America, Inc.	
RESOLVED COMPLAINTS:	

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Eberspaecher North America, Inc. (U-63-12-0171) 30220 Oak Creek Dr.

Wixom, Michigan 48393-2430

On February 03, I conducted a level 2 self-initiated inspection of Eberspaecher North America, Inc. ("Eberspaecher" – American spelling for German spelling, ae for a with two dots, ä i.e. Eberspächer) located at 30220 Oak Creek Dr., Wixom, Michigan 48393-2430. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQAQD) administrative rules.

During the inspection, Mr. Danny Thomas (Phone: 248-982-2946-Cell; Fax: 248-960-7890; E-mail: Danny.Thomas@eberspaecher.com), HSE Coordinator, Mr. Tony Komisar (Phone: 248-795-3450-Cell; Fax: NA; E-mail: Tony.Komisar@eberspaecher.com), Eng. Manager, and Mr. Chris Hendriksen (Phone: 248-912-7678-Cell; Fax: NA; E-mail: , Chris.Henriksen@eberspaecher.com), Maintenance Supervisor, assisted me.

Mr. Richard Norton (Phone: 248-707-0129-Cell; Fax: 248-960-7890; E-mail: richard.norton@eberspaecher.com), Maintenance Manager, separated about June 2015. Ms. Trish Carter, HR manager, separated about November 2015. Ms. Cheryl Lipan (Phone: 248-854-0750-Cell; Fax: 248-960-6106; E-mail: Cheryl.lipan@eberspaecher.com), HR Manager, separated from the company about 2012. Ms. Kathy Gurnee (Phone: 248-635-1709; E-mail: Kathy.Gurnee@eberspaecher.com), is now HR manager at Brighton location.

Eberspaecher is in the business of manufacturing exhaust systems (Selective Catalytic Reduction [SCR]) for commercial vehicles and some passenger cars (diesel) cars as well. 100,000 sq. ft. Wixom facility performs mostly welding operations. The German parent company is in business since 1865. In US, Eberspaecher started operation since 2000. Eberspaecher started its operations in Wixom since 2009. Upon running out space in Brighton, the company started operations at the Wixom location as well. Brighton unit assembles exhaust system also. About 2011, GenMar, Novi, facility started its operation. In addition, there is one more Novi facility (N6975).

## Welding stations / machines

There are numerous welding stations (ArcWorld Yaskawa, Cell 6, Cell X, Cell V, Repair, etc.), which are installed in 2010-2014. Eberspaecher is expanding rapidly and continues to install more welding stations in Wixom. From 2012 through 2015, Wixom plant has experienced rapid expansion such that plant is running out of space. Approximately, 25 welding stations

are present. Particulate emissions from these stations are controlled by 12 dust collectors each consisting of cartridge filters. Attached is a list of dust collectors and corresponding information regarding cartridge filters. Five more welding stations are being installed.

Each machine's particulate emissions are controlled by a cartridge filter type control system. All dust collectors (12: Robovent, Torrit, Nederman, Donaldson, etc) for welding stations (25) are located inside the building. There is no exhaust to outside ambient air; filtered air is re-circulated into the plant. Pulse-jet air is used clean the filters. 55-gallon drums, or such containers, are used as hoppers to collect dust from filters.

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 (I).

## Cold-cleaner - Safety-Kleen Model 81.8 Aqueous Agitating Parts Cleaner

Safety-Kleen NASCAR performance aqueous agitating machine is present. A rack and baskets are immersed and water-based liquid cleaner can be agitated. During the operation and hence agitation, lid is closed. Liquid temperature is maintained at 120 °F (Max. 150 °F) to assist degreasing and cleaning. Agitation of the solution results in turbulent mass transfer, which is much faster (rate, unit mass / mole per unit time) than diffusion.

Armkaklen containing inorganic and alcohol cleaners is used.

At the Wixom facility, there is neither painting nor solvent degreasing.

## Conclusion

Welding machines / processes, cold-cleaners, etc. are exempt from Rule 336.1201.

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