

U-63-15-00726

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

U63150072636461

FACILITY: Eberspaecher North America, Inc.		SRN / ID: U631500726
LOCATION: 43700 Gen Mar, Novi		DISTRICT: Southeast Michigan
CITY: Novi		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 09/08/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2016 inspection of Eberspaecher North America, Inc.		
RESOLVED COMPLAINTS:		

U 63 15 00 726 - SAR - 2016 09 08

**Eberspaecher North America, Inc. (U-63-15-00726)**  
**43700 Gen Mar**  
**Novi, Michigan 48375-1667**

On September 08, 2016, 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 (MDEQ-AQD) administrative rules.

During the inspection, Mr. Chris Mieczkowski (Phone: 248-567-9572-Cell; Fax: 248-NA; E-mail: Chris.Mieczkowski@eberspaecher.com), Corporate SHE Manager, and Ms. Kaylyn Cox (Phone: 248-320-4986-Cell; Fax: 248-NA; E-mail: Kaylyn.Cox@eberspaecher.com), SHE Coordinator, and Mr. Joseph Gayton (Phone: 248-302-2966-Cell; Fax: 248-NA; E-mail: Joseph.Gayton@eberspaecher.com), Production Supervisor, assisted me.

Mr. James Goodall (Phone: 248-525-5207-Cell; Fax: 248-305-5916; E-mail: James.Goodall@eberspaecher.com), Maintenance Supervisor, transferred to Brighton.

Eberspaecher is in the business of manufacturing automobile exhaust systems for mostly passenger cars at Novi facility; current customer is Chrysler. Like Wixom (U-63-12-0171) facility, Novi facility performs mostly welding operations. The German parent company is in business since 1865. In US, Eberspaecher started operation since 2000. While Eberspaecher started its operations in Wixom since 2009, in Novi since November 2011. Upon running out space in Brighton (N8266), the company started operations at the Wixom and Novi locations. Brighton unit assembles exhaust system also. There is one more Novi plant (N6975 [Lim: FY 2012 inspection, PTI No. 127-01A for dyno test cells], 29101 Haggerty Road, Novi).

Raw materials (pipes, shells, hangers, brackets, etc.) are stored in an area known as supermarket. Pipe bending area is present. Three computer controlled pipe bending machines (Addison McKee) are present. Emissions are released to in-plant environment. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I).

### **Welding stations / machines**

There are twenty seven (27) welding stations (ArcWorld Yaskawa, Arco), which were installed during 2010-2015 period. From approximately, 27 welding stations, particulate emissions are captured from fully enclosed welding cells via a vacuum system. When a cell is not in

operation, it is automatically (computer controlled) isolated from the vacuum system. Conversely, when a cell comes on line, vacuum to the cell is applied and fan speed is adjusted. Fan speed is adjusted by a computer control system to maintain set-point vacuum in the ductwork. Such computer controlled vacuum management system saves electrical energy. All exhaust laden with particulate matter from welding operations is ducted via common manifold to three Donaldson Torit Filter Systems (two identical dust collectors consisting of 32 cartridges each [64 cartridges total] with four 55-gallon drums each as hoppers [8 drums total] and one smaller unit consisting of 24 cartridges and three 55-gallon drums as hoppers). Exhaust from Donaldson Torit Filter Systems (3 units) is ducted to HEPA filter system (3 HEPA units) to further clean exhaust air to make it suitable for breathing and thus cleaned air released to in-plant environment.

All welding is robotic; no manual welding. All welding is computer controlled and programmed. In addition, vacuum to each welding cell is computer controlled such that set-point vacuum is maintained when welding and nil vacuum (isolated from variable speed vacuum fan) when a welding cell is idle.

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

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

#### **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 assist degreasing and cleaning.

As FCA SHAP (Sterling Heights Assembly Plant) is moving small car production to Mexico, 3-shift welding is reduced to 1-shift welding. Consequently, employment is reduced from 150 to 30.

#### **Conclusion**

Welding machines / processes are exempt from Rule 336.1201. HEPA filter system is present to improve in-plant breathing air. Upon filtration using Donaldson Torit and HEPA filters, all exhaust gases are released to in-plant environment.

NAME S. McManis DATE 09/12/2016 SUPERVISOR Joyce