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

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FACILITY: A123 SYSTEMS	SRN / ID: N8318			
LOCATION: 39000 SEVEN MILE RD,	DISTRICT: Detroit			
CITY: LIVONIA		COUNTY: WAYNE		
CONTACT: Thomas Spirl , Facilities Supervisor at the Novi Location		ACTIVITY DATE: 07/15/2020		
STAFF: C. Nazaret Sandoval	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR		
SUBJECT: FY 2020 Scheduled Inspection				
RESOLVED COMPLAINTS:				

SOURCE: SRN N8318 – A123 Systems, LLC FACILITY LOCATION: 39000 Seven Mile Rd., Livonia, MI 48174 PURPOSE OF INSPECTION: Scheduled Inspection INSPECTION DATE: 7/15/2020 INSPECTOR: Nazaret Sandoval (EGLE-AQD)

1.- BACKGROUND

NI02105/260

AQD records show that A123 Systems, LLC (A123) operated its Michigan headquarters in Wayne County out of a facility at 39000 W. Seven Mile road, just west of Interstate 275, in Livonia. A123 leased a 291,000 square foot building for its business operations which included: research and development, engineering functions and administrative offices.

AQD inspected this facility on 9/11/2018 and observed the manufacturing activities which consisted of cell assembly of rechargeable lithium-ion battery in Low Volume Manufacturing (LVM) production packs. They had a module assembly line and a prototype battery assembly line. The electrodes rolls use for the assembly of the battery packs were produced at the A123 manufacturing facility in Romulus.

The building had other areas: the warehouse, shipping and receiving, a quality control lab, the module/pack validation testing area and the starter battery assembly area. There were also minor welding operations and one adhesive booth in the module assembly area. The utilities included small space heaters, a boiler, the diesel-fired fire pumps and two natural-gas fired emergency generators.

An itemized list with a detailed description of the cited areas as well as the equipment specifications was provided in the inspection report dated 9/11/2018.

As a result of the inspection conducted on 9/11/2018, AQD verified that all the process and/or process equipment installed and operated by A123 in Livonia were exempt from the requirements of Rule 201 to obtain a Permit to Install (PTI). The facility used specific exemptions listed in R 336.1280 to R 336.1291 and demonstrated the applicability of the exemptions in accordance with the provisions of Rule 278a(1). Refer to a Technical Memo dated 12/7/2018 prepared by A123's consultants on behalf of A123 Livonia.

In conversations with Mr. David Anderson, former EHS Manger at the Livonia facility, he said that there were plans to move the operations to another location as soon as construction of the new building in Novi was complete and that was projected to occur at the end of year 2018.

In addition, in an article published by the Detroit Free Press on 4/4/2017, A123 Systems had announced that its new 150,000-square-foot headquarters would be located on a 32-acre plot

of land near the Fountain Walk retail complex, located not far from 12 Mile and Novi roads. The new facility, on a company-owned land, will house all corporate functions, an engineering center, new laboratory space and a manufacturing plant.

2.- SITE INSPECTION

On July 15, 2020 during the inspection I conducted at A123 Romulus, I learned from Mr. Joseph Frendo (the plant manager of the A123 facility in Romulus) that the Livonia facility ceased its operations on 10/31/2019. He provided a shut-down confirmation letter.

In the afternoon hours, on July 15, 2020, I decided to visit the A123 building in Livonia to verify that the building was empty. I arrived at the site location at about 2:00 pm. The entrance to the parking lot at W. Seven Mile was locked and a sign at a gate directed the drivers to use the North entrance, off Haggerty Road, behind the AMC Livonia 20 Theaters. I drove north on Haggerty Road and took the next street driving east towards the path leading to the back of the A123 building. Although, there were still signs identifying the business as A123 I could not get into the parking lot or to the building because the entrance to the parking lot was also restricted. Therefore, I decided to drive around the area, but I only saw construction crews. I left the area at around 2:15 pm. It appears as if another business was going to occupy the building. I assume that A123 has fully relocated the equipment to Novi.

Given the difficulties I had to get in the building, I decided to contact Mr. Thomas Spirl, who I have met in the past. I learned from Mr. Frendo that Mr. Spirl was the Facilities Supervisor at the new A123 facility in Novi and he gave me Mr. Spirl's contact information. I called Mr. Spirl on July 28, 2020 and I followed up with an email message. In my message I asked Mr. Spirl to confirm the status of the plant relocation and I also asked him about the operations that are currently occurring at the new facility in Novi in case there are emission units requiring AQD permits.

Mr. Spirl responded to my email on 7/29/2020 and gave me the address of the new facility. They are located at 27101 Cabaret Drive, Novi, MI 48377.

He confirmed the total relocation from Livonia to Novi and indicated that A123 personnel no longer have access to the Livonia plant. Beaumont Hospital purchased the building and the property at that location. He gave me the contact at Beaumont, Amanda Mulak

(Amanda.Mulak@Beaumont.org), in case I still wanted to gain access to the building in Livonia. However, I told him it will not be necessary.

In his email message he did not offer details about the operations at Novi but indicated we could schedule a visit and he will be available to answer any questions we may have about the facility.

3.- CONCLUSION

A123 Systems, LLC, with SRN N8318, operating in Wayne County since 2010 at 39000 Seven Mile Rd., Livonia, MI 48174, shut down its operations effective 10/31/2019. All equipment has been relocated to a company-owned building located in Oakland County, at 27101 Cabaret Drive, Novi, MI 48377.

This inspection report will be transmitted to A123 responsible parties and the facility record for SRN N8318 will be temporarily closed at the appropriate time at the end of this fiscal year, pending any further air regulatory activities performed by the new owner of the facility, Beaumont Hospital.

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DATE 9/18/2020 SUPERVISOR

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