

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

FY 2015 Insp

U63150072628373

FACILITY: Eberspaecher North America, Inc.		SRN / ID: U631500726
LOCATION: 43700 Gen Mar, Novi		DISTRICT: Southeast Michigan
CITY: Novi		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 01/21/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2015 inspection of Eberspaecher North America, Inc. ("Eberspaecher" – American spelling for German spelling, ae for a with two dots, ä i.e. Eberspächer)		
RESOLVED COMPLAINTS:		

U-63-15-00726-SAR-2015 01 21

**Eberspaecher North America, Inc. (U-63-15-00726)**  
**43700 Gen Mar**  
**Novi, Michigan 48375-1669**

On January 21, 2015, 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. James Goodall (Phone: 248-525-5207-Cell; Fax: 248-305-5916; E-mail: James.Goodall@eberspaecher.com), Maintenance Supervisor, assisted me.

Mr. Chris Mieczkowski (Phone: 248-567-9572-Cell; Fax: 248-NA; E-mail: Chris.Mieczkowski@eberspaecher.com), Corporate SHE Manager was not present.

Eberspaecher is in the business of manufacturing automobile exhaust systems for mostly passenger cars at Novi facility; current customer is Chrysler. Like Wixom 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, 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] 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) present.

### **Welding stations / machines**

There are twenty seven (27) welding stations (ArcWorld Yaskawa, Arco), which are installed in 2010-2015. Eberspaecher is expanding rapidly and continues to install more welding stations. From approximately, 27 welding stations, particulate emissions are captured from fully enclosed welding cells via a vacuum system. When a cell not in operation, it is automatically (computer controlled) isolated from the vacuum system. Fan speed is adjusted by a computer control system to maintain set-point vacuum in the ductwork. All exhaust laden

with particulate matter from welding operations is ducted via common manifold to three Donaldson Torit Filter System (2 identical consisting of 32 cartridges each [64 total] and one smaller consisting of 24 cartridges). Exhaust from Donaldson Torit Filter System (3 units) is ducted to HEPA filter system (3 HEPA units) to further clean exhaust air to make it suitable for breathing and released to in-plant environment.

All welding is robotic; no manual. All welding is computer controlled and programmed.

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

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.

**Conclusion**

Welding machines / processes are exempt from Rule 336.1201. HEPA filter system is present to improve in-plant breathing air.

NAME J. S. McManahall      DATE 01/27/2015      SUPERVISOR CJE