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

B206246613

FACILITY: Gestamp Washtenaw, LLC		**SRN / ID:** B2062
LOCATION: 5800 SIBLEY RD, CHELSEA		**DISTRICT:** Jackson
CITY: CHELSEA		**COUNTY:** WASHTENAW
CONTACT: Frank Keller , EHS Coordinator		**ACTIVITY DATE:** 10/04/2018
STAFF: Mike Kovalchick	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Unannounced compliance inspection of a new stamping plant with E-Coat line.		
RESOLVED COMPLAINTS:		

Minor Source: Opt-out Source for HAPS. Full Compliance Evaluation (FCE)

Facility Contacts

Frank Keller: EHS Coordinator fkeller@us.gestamp.com ph 734-595-9073

Website: https://www.gestamp.com/about-us/gestamp-in-the-world/centers.aspx

Purpose

On October 4, 2018, I conducted an unannounced compliance inspection of Gestamp Washtenaw, LLC (Company) located in Chelsea, Michigan in Washtenaw County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and Permit to Install (PTI) # 78-17.

Facility Location

The facility is located in an industrial park in Chelsea but with residential homes about 250 feet to the North and a playground style park just to the East. See attached aerial photo.

Facility Background

The facility has never been inspected while occupied with the current owners. A permit was issued in August 2017 for a metal stamping, assembly and E-Coat facility.

Regulatory Applicability

PTI 78-17 covers an E-coat process.

Robotic MIG welding is considered exempt from PTI requirements per Rule 285 (2) (i).

2 new small natural gas fired emergency generators subject to 40 CFR Part 60, Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engine. (Meeting NSPS requirements satisfies RICE MACT Subpart ZZZZ.)

Arrival & Facility Contact

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at 9 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Shawn Fallot (SF) and Chris Jurkoshek (CJ). I informed them of my intent to conduct a facility inspection and to review the various records as necessary.

Both men extended their full cooperation and fully addressed my questions.

Pre-Inspection Meeting

I was told that Frank Keller, the EHS coordinator was away from the office and there was nobody else familiar with the air environmental program at the facility. However, I would be given a tour of the facility and Shawn and Chris would attempt to answer any questions I had.

Construction at the facility was completed in March 2018 with some pre-production activity starting in June. They

currently don't expect full production to be reached for at least another year. Only very small batches of parts are currently being coated. One coating run was completed earlier in the week but the coating line was idle during the inspection.

They have one enclosed stamping press with two sides with a combined weight of 4000 tons. They also have a new E-coat line and do some robotic MIG welding. They stamp and coat metal auto parts for Ford.

They have 104 full time employees working from in shifts from 6 am to 10 pm 5 days a week.

Onsite Inspection

SF and CJ gave me a tour of the facility. We first walked by some enclosed MIG welding cells that are vented to the roof. Very little activity was seen in this part of the plant with only faint odors and no smoke associated with this process.

Next, we looked at the 2 new natural gas fired emergency generators. One was being used as backup power for office computers while the other was to maintain the temperature of the paint in the event of a loss of power. Basically, neither one had been used yet. It appears that they did have the ability to display the hours of usage and produce maintenance information so appeared to be in compliance with NSPS JJJJ. See attached photos.

Next, we visited the E-coat line. It was not operating but the various tanks in the line were full of liquid.

The packed bed scrubber and dryer were located above the fully enclosed E-coat line. The scrubber was not easily accessible as a safety harness would be needed to reach it so it wasn't looked at closely. See attached photo. It did appear to be new and was equipped with the required pressure drop device. Duct work from the dryer, the E-Coat line and scrubber appeared to be in excellent condition.

Part of the E-coat line contains an acid tank that is split into 2 by a ventilation bar going across it. The fumes from a sulfuric/phosphoric acid mixture in the acid tank are collected with linear horizontal hoods which duct emissions to the scrubber. See attached photos.

Overall, the E-coat line as built appeared to be consistent with blue print drawings provided in PTI application 78-12.

Next, we visited the roof of the E-Coat line to verify required stack heights. See attached photos. The roof and ventilation equipment appeared to be in good shape. It was noted that the intake make-up air vent was very close to the discharge of the oven stack. The roof was verified to be 42 feet high. (See Attachment (1)). Visually, it appeared all that the stacks met the PTI stack height requirements. However, that SV-WATERHEATER had a rain cap on it and so emissions from the 2 MM natural gas fired boiler were not being discharged unobstructed vertically upwards as the PTI required.

Finally, we visited the stamping building which was located on the East side of the facility. It contained a fully enclosed large stamping process split into 2 sections each weighting 2000 tons. No emissions were noted when it was operating. They do occasionally use some type of water-based spray on the metal to prevent the parts from sticking to the stamping press when they remove the parts.

Recordkeeping/Permit Requirements Review

Attachment (2) is a response I received on 10/10/2018 from the Company. It included all required records for the PTI since the facility started operating and the Malfunction Abatement Plan. (MAP)

Review of the MAP showed that it is satisfactory. Acceptable pH levels of the scrubber are between 8 and 11.5. Acceptable pressure drop readings are never below 0.5" or above 3" for the scrubber.

Review of pressure drop/ pH level records show compliance with recordings starting March 24, 2018 till October 6. Pressure drop generally was at 1.6" and pH varied from 9.5 to 10.6.

Review of coating records showed that they are using only Powercron 6100HE coating that has a VOC content of 0.62 lbs/gallon minus water. (Limit is 0.7) Each month averaged 155 gallons of usage. This generated about 34 pounds of VOC emissions per month. (Limit 10 TPY.)

HAP content is only 2.49 pounds per 100 gallons of Powercron 6100 HE and about 155 gallons per month is

being used so only 0.001925 tons/month of HAPs are being emitted. (Limit less than 8.9 tons per year for individual HAPs.)

Overall, emissions are extremely low at this facility partially due to the fact that they remain well under expected production levels. The facility was in compliance with all emission limits, material limits, process/operational restrictions, design/equipment parameters, testing/sampling requirements, monitoring/recordkeeping for both EUECOAT and FGFACILITY. This facility will be required to submit a MAERS report due to its opt-out status.

Post-Inspection Meeting

I held a brief post-inspection meeting with SF and CJ. I indicated to them that I would contact Frank Keller later in the day to get the required records for him. My only finding was the presence of a rain cap on the natural gas fired boiler stack. I noted that this was a rather dubious permit requirement requiring no rain cap for emissions from a small natural gas fired boiler that could be resolved informally and would discuss resolution with Frank as well. I thanked the 2 gentlemen for their time and cooperation, and I departed the facility at approximately 10:25 am.

Compliance Summary

The Company is in compliance.

Note: Follow-up email from the Company on October 16, 2018 outlined that the rain cap had been removed and provided pictures to document it.

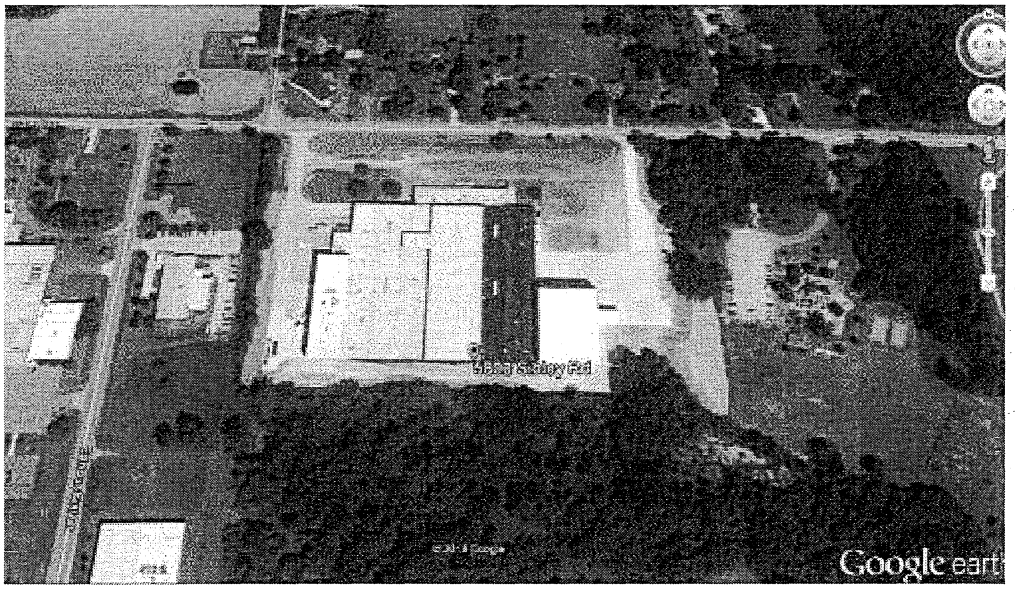
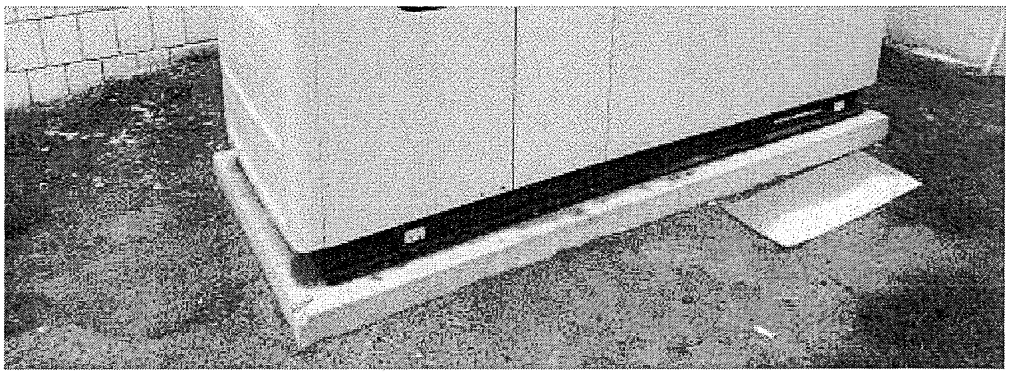


Image 1(Aerial photo) : Aerial photo.



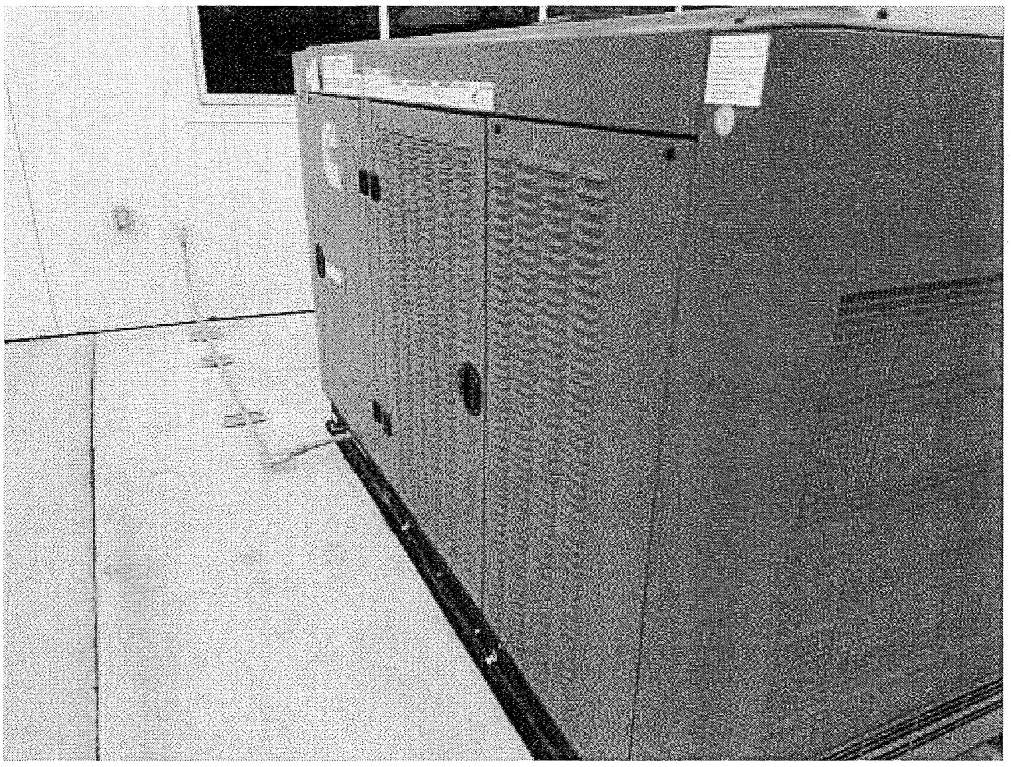


Image 3(Emergency generator) : Emergency generator for E-coat tanks to maintain temperature in the event of a power failure.

Image 4(Acid tank) : Acid tank

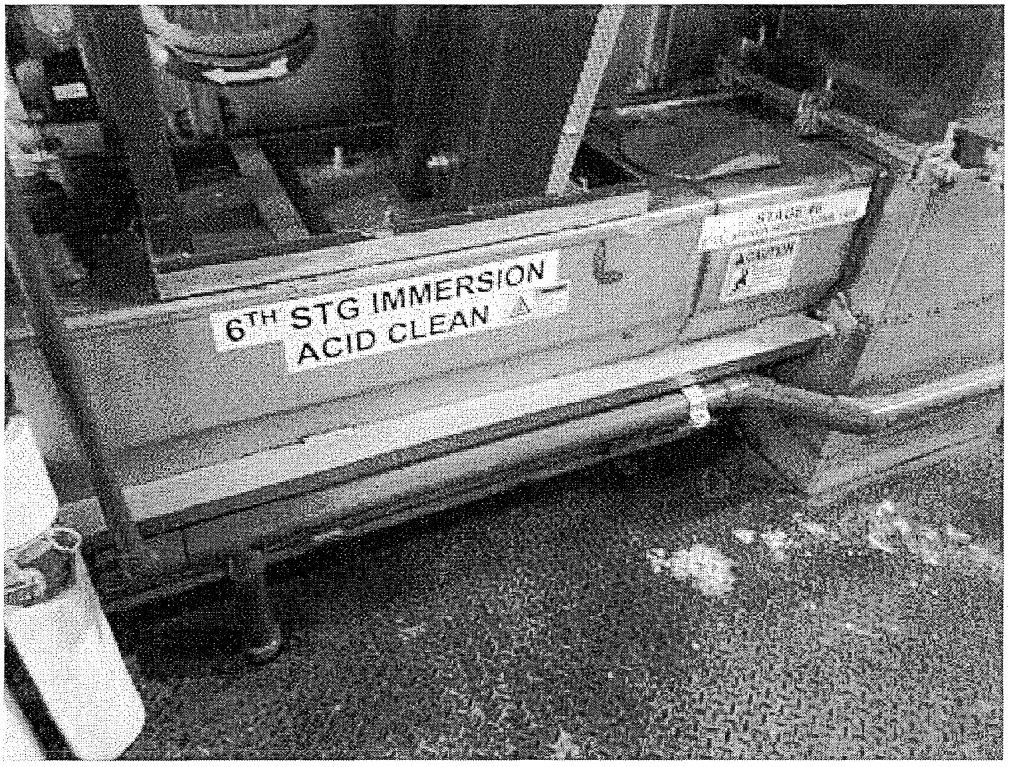


Image 5(Acid tank label) : Acid tank label

Image 6(Wet scrubber) : Wed scrubber next to oven.

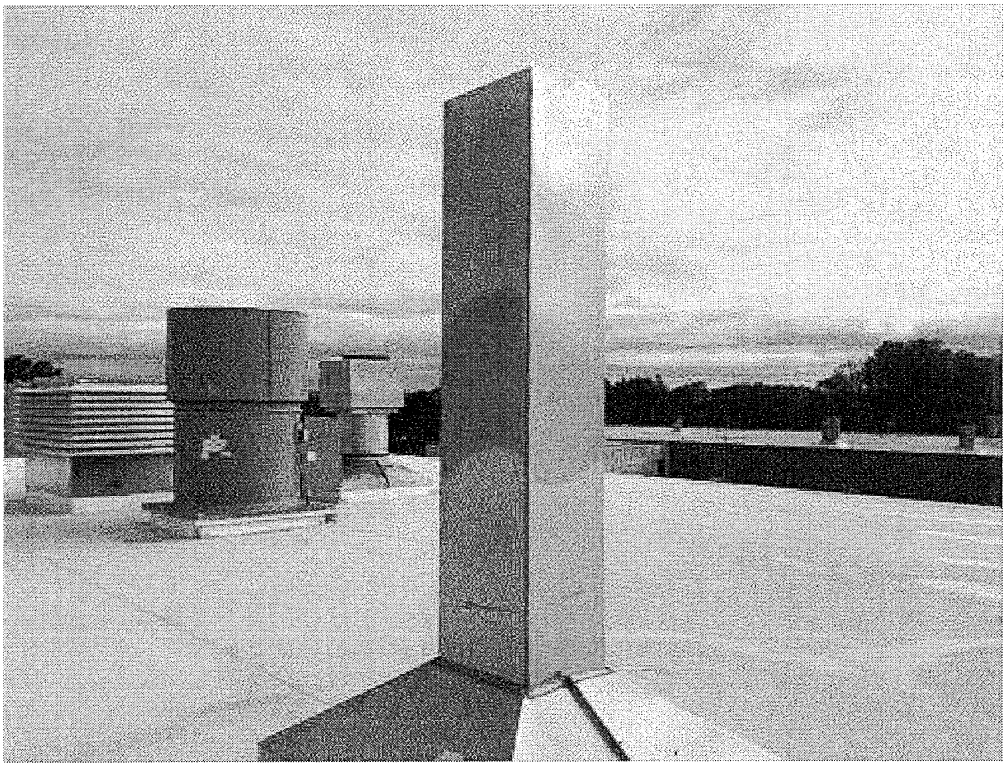


Image 7(Roof stacks) : Roof stacks. Oven stack next to air intake stack.

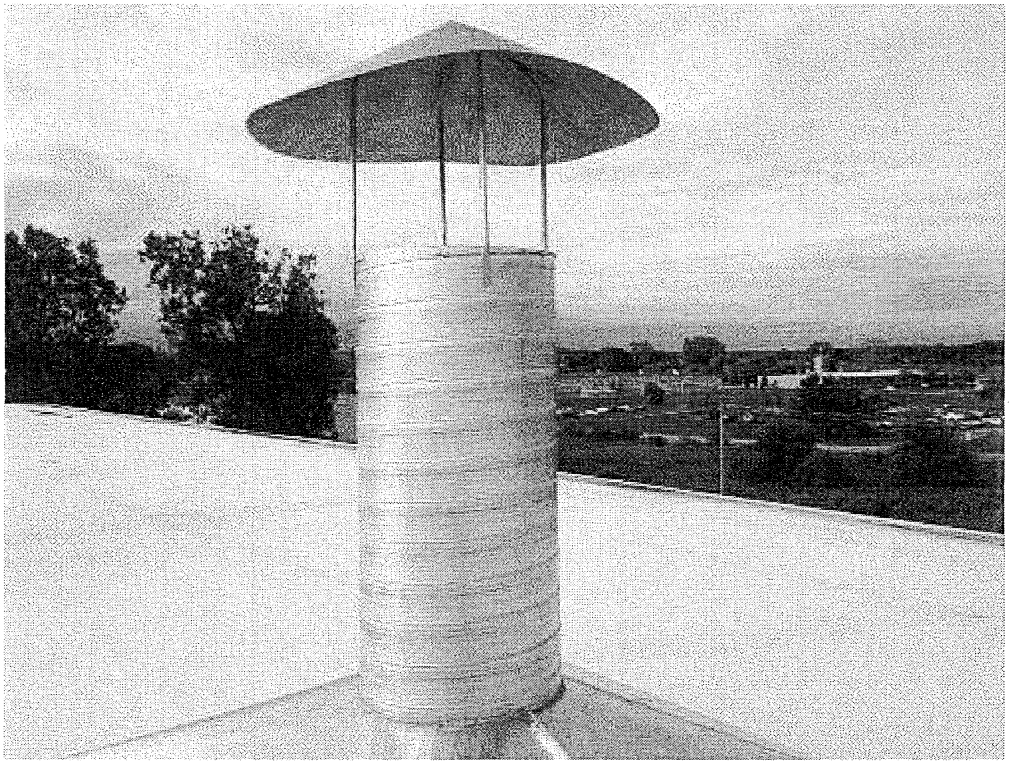


Image 8(Rain cap) : Rain cap on natural gas boiler stack.

NAME M. Kovalchuk DATE 10/22/18 SUPERVISOR