

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

N085245908

FACILITY: WALBRO ENGINE MANAGEMENT CORP		SRN / ID: N0852
LOCATION: 6242 GARFIELD ST, CASS CITY		DISTRICT: Saginaw Bay
CITY: CASS CITY		COUNTY: TUSCOLA
CONTACT: Robin Curcio , Environmental/Health & Safety		ACTIVITY DATE: 08/30/2018
STAFF: Meg Sheehan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled site inspection		
RESOLVED COMPLAINTS:		

On Thursday, August 30, 2018, a scheduled site inspection was conducted by AQD District staff at Walbro Engine Management Corporation in Cass City, Tuscola County. Walbro representative Robin Curcio provided a tour of the facility. The facility was in operation upon our arrival, but most of the permitted equipment was not. Site inspection activities were conducted with the intent of confirming compliance with permit conditions, as well as determining current and historical use of products containing PFAS (Per- and Polyfluoroalkyl Substances).

FACILITY DESCRIPTION

Walbro manufactures and assembles a range of parts for small engines, such as boat motors and lawn mowers. They test fuel pumps and manufacture plastic gas tanks for equipment such as weed whips and snowmobiles. The plastic gas tanks are made using plastic blow molding equipment using air as the blowing gas, which appears to be exempt under Rule 286(2)(c)(i). A portion of the plant also uses die casting machines, which appear to be exempt under Rule 285(2)(i)(ii). See attachment 1 for a map of the area surrounding the facility.

COMPLIANCE HISTORY

No complaints are of record for the facility. Two violation notices were sent as a result of the January 30, 2013 site inspection. The VNs cited Special Condition 17 for PTI 868-91 and were resolved on July 23, 2013 after the company responded with the appropriate information. At the time of the most recent site inspection conducted on December 17, 2013, the facility was found to be in compliance with its permits and air rules. To date the facility has not been required to report to MAERS.

COMPLIANCE EVALUATION

Walbro currently has seven active Permits to Install (PTI), and six voided PTIs. Two permits (609-84A and 607-84A) were voided as a result of the December 2013 inspection. Four permits (245-89, 244-89, 243-89, 242-89) were voided in 1994. Facility staff reported no changes to any of the processes (including raw materials and fuels) discussed below since the last inspection.

1024-84A

Approved September 6, 1985 for a final phase washer/dryer and a Surftran thermal deburring unit, both are vented externally and are natural gas fired. The washer/dryer uses hot water to pre-clean machining chips and cutting fluid residue from parts prior to deburring. The Surftran thermal deburring unit uses oxygen to thermally remove metal "burrs" left on parts after the machining process. The part is placed into the deburring chamber, and a mixture of natural gas and oxygen is fed into the chamber. The gases are ignited by a spark, and the subsequent combustion temperature reaches approximately 3,500 degrees Fahrenheit (above the ignition temperature of the burr). Excess oxygen in the chamber leads to a chemical reaction which vaporizes the burr completely.

Both machines can be found in the "plating room." Neither machine was operating at the time of our inspection, so visible emissions could not be evaluated. No recordkeeping is required with this permit. No requests for testing are of record. It should be noted that in the inspection reports from January and December of 2013, the washer/dryer is identified as a cold cleaner. During this inspection, it was clarified that the unit is not a cold cleaner.

476-85

Approved September 6, 1985 for a waste water treatment system, including one 200-gal sodium bisulfite tank and one 370-gal chrome reduction tank (both are vented externally). First, sulfuric acid is added to the wastewater from the dichromate plating line to lower the pH. Sodium bisulfite is added, which reduces

hexavalent chromium to trivalent chromium. The wastewater is neutralized with sodium hydroxide, then clarified using calcium chloride and a polymer which pulls the heavy metals out of solution and produces a filter cake. The water is sent through a filter press and then sand filters before going to a holding tank. The treated water is discharged to the Cass City wastewater treatment plant. See attachment 2 for a diagram of the wastewater treatment room. The process was in operation at the time of our inspection, and no visible emissions were observed. No recordkeeping is required with this permit.

477-85

Approved September 6, 1985 for a dichromate plating line vented externally. This process is subject to 40 CFR Part 63, Subpart W – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. Currently the MDEQ does not have delegation for this NESHAP. The process was not operating at the time of our inspection so visible emissions could not be evaluated. No recordkeeping is required with this permit.

Aluminum parts are coated with one of two different products to prevent rusting. The tanks are kept at ambient temperature, and no electrical currents or fume suppressants are used (the previous inspection reports identified the process as electroplating). The coating line operates from approximately 4 am to 10 am every day, and it takes about 20 minutes for a part to run through all the tanks. There are nine tanks, listed from first step to last:

- One cleaner tank – Ridoline 53 is added to this tank (see attachment A in the MSDS folder).
- Three rinse tanks – Just water
- One plating tank – Alodine 1500 is added to this tank to create a clear coat (see attachment B in the MSDS folder). It contains chromic acid.
- One plating tank – Alodine 600 is added to this tank to create a yellow colored coat (see attachment C in the MSDS folder). It contains hexavalent chromium. The parts go to either the Alodine 1500 tank or the Alodine 600 tank, but not both.
- Three rinse tanks – Just water

While this plating line is not subject to 40 CFR Part 63, Subpart N – NESHAP for Hard and Decorative Chrome Platers, a PFAS use evaluation was conducted as part of the MDEQ's investigation into the use of PFAS by industry. The checklist, which was filled out as part of the inspection and will be sent to Steve Lachance in the Air Quality Division, has been attached to this inspection report in the district file (see attachment 3). Based on information (Safety Data Sheets) provided by the company, it appears the above products do not contain PFAS. Additionally, wastewater from the facility was tested on June 20, 2018 by Eurofins Lancaster Laboratories Environmental for PFAS (see attachment 4). All results came back non-detect except for perfluorooctanoic acid (CAS # 335-67-1) which was detected at 0.86 nanograms per liter.

605-84A

Approved November 12, 1985 for an autoclave impregnation system vented externally. The autoclave is in a room behind the plating line and is used to apply sealant into depressions or cavities on parts. Parts are placed into the autoclave and the lid is locked shut. Negative pressure is applied to remove air from the void spaces, sealant (Ultraseal PC504/66 – see attachment D in the MSDS folder) and a catalyst (Ultraseal DB42 – see attachment E in the MSDS folder) are pumped into the autoclave to fill the void spaces, and centrifugal force is applied to remove excess fluid. Once this process is done, the parts are removed and placed into a cold rinse, then a hot rinse (both water), which hardens the sealant.

The process was not operating at the time of our inspection so visible emissions could not be evaluated. When a new barrel of sealant/new box of catalyst are opened, the date and amount is recorded on a clipboard in the plating room. AQD staff has deemed this an acceptable form of record keeping. No requests for testing are of record.

435-86

Approved July 21, 1987 for a groundwater clean-up operation using an air stripper. The air stripper has not operated since the 1990s, and Walbro staff question whether it would run if started. Monthly groundwater sampling and monitoring is performed by APTIM as part of a consent order with the Remediation and Redevelopment Division. According to Ann Person, RRD Supervisor, the air stripper does not need to remain in place as part of the CO (attachment 5). Walbro has been notified of this, and the PTI will remain active until a request to void it is received.

868-91

Approved March 11, 1994 for an epoxy accumulator process vented internally. The process is used for setting components of automotive fuel pumps into a solid state at room temperature. Small amounts of isopropyl alcohol are used to clean the epoxy applicator. See attachment 6 for images of the process.

The process was not operating at the time of our inspection so visible emissions could not be evaluated. Safety Data Sheets for the resin (ELAN-Tron U-2375 / L5; attachment F in the MSDS folder) and hardener (ELAN-Tron P-2490 BK; attachment G in the MSDS folder) were provided by Ms. Curcio via email, as well as spreadsheets with daily and monthly usage rates, and daily and monthly VOC emissions for the resin and hardener (attachments 7 and 8). Based on the records that were provided, this process is being operated within its permit limits.

867-91

Approved March 21, 1994, for a Xybex coolant recycling system vented externally. The coolant recycling process removes contaminants and machine oil from the cutting fluid solution used in manufacturing (HOCUT 795; attachment H in the MSDS folder). Contaminants and oil are physically separated from the coolant via the use of a skimmer apparatus and centrifuge

The process was in operation during our inspection and no visible emissions were observed. The SDS for HOCUT 795 lists the VOC content of the coolant. No other record keeping is required.

COMPLIANCE DETERMINATION

At this time, Walbro Engine Management Corporation appears to be in general compliance with their permit conditions, and all applicable rules and regulations.

NAME Meg Sheehan DATE 9/25/18 SUPERVISOR C. Hove