

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

N166236702

FACILITY: KIRCHHOFF Van-Rob Tecumseh		SRN / ID: N1662
LOCATION: 1200 E. Chicago Blvd., TECUMSEH		DISTRICT: Jackson
CITY: TECUMSEH		COUNTY: LENAWEE
CONTACT: Kenneth Gummow , EHS Administrator		ACTIVITY DATE: 09/20/2016
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Unknown	SOURCE CLASS: MINOR
SUBJECT: To inspect facility due to aerial photos that showed recent stack additions on facility's roof along with associated roof discolorations adjacent to the new stacks.		
RESOLVED COMPLAINTS:		

On September 20, 2016, Mike Kovalchick (AQD Staff) conducted a self initiated unannounced compliance inspection of this facility, to investigate additional exhausts that were installed recently on the facility's roof per aerial photographs. The purpose of the inspection was to determine the facility's compliance status with applicable state and federal air pollution control regulations, in particular, Michigan Air Pollution Control Act 451 Part 55 and the administrative rules. Lenawee Stamping(now KIRCHHOFF Van-Rob Tecumseh) operated under an Air Use Permit to install in the past. This was voided as of February 21, 2008 based on the Company's request upon demonstrating qualification for Rule 201 exemptions for their process equipment. The Company requested the void following the previous Air Quality Division (AQD) inspection on September 14, 2006. This was conducted by another AQD staff person and the report and correspondence are in the AQD files.

Prior to the inspection, aerial photographs of the roof of the facility was reviewed. A Google Earth photo taken 4-3-2013 (Attachment 1) was compared to a 7-14-2015 photo. (Attachment 2) The more recent photo showed that additional stacks have been added to the SW corner of the facility with roof discoloration present adjacent to the new stacks. No other changes were noted.

On the day of the inspection, upon arrival, AQD Staff did not see or smell anything unusual in the area of the facility. KIRCHHOFF is located on a large piece of property just to the East and outside of the Tecumseh downtown area. It is a large one story building, with multiple roof heights and numerous exhaust stacks. The visitor's entrance is now a side entrance on the West side of the building. (Safety Equipment Requirements: Safety glasses, steel toed boots, ear plugs, long sleeves.) AQD Staff met with Ken Gummow who is the EHS Administrator and who started his job within the last year. AQD Staff identified himself and stated the purpose of the visit. During the pre-inspection interview, AQD Staff learned that KIRCHHOFF operates 3 shifts Monday through Friday. They currently have approximately 850 employees which is an increase from 570 employees when the facility was last inspected in 2010. Ken was unable to detail what changes had occurred at the facility since the last inspection since he was new to the facility. AQD Staff's impression was that most changes were minor mostly related to the installation of different types of welding operations. They still primarily do stamping and resistance welding of metal making a variety of automotive parts out of steel. Ken did indicate that there was a corporate decision made around October, 2015 to no longer operate the sixteen JP 52-2 electro static precipitators(Attachment 3) that control emissions from welding operations as they required filter cleanings every 3 or 4 days which was very man power intensive. Ken said the facility was investigating installing new dust collectors that would be more cost effective. (See Attachment 4.)

AQD Staff requested a list of all processes that have their own dedicated exhaust to the outside. (See Attachment 5.) In general, only these processes were inspected. There are various other processes that generate very small amounts of emissions such as epoxy adhesive machine that uses about 1 barrel of material per week. The MSDS shows that it is 0% volatile.

The majority of KIRCHHOFF's process equipment consists of a wide range of steel presses, stamping, and welding machines. They manufacture body frames, electrical frames, and safety structures in dashes and doors. Steel parts (stamped etc...) are welded to other steel parts. They receive steel rolls in a wide range of sizes and thicknesses and some steel comes in pre-cut steel sheets. Steel is unrolled, pressed, cut, shaped and/or has holes punched in it. During the inspection AQD Staff observed operating presses and stamping process equipment that qualifies for the R201 exemption, R285 (l) (i) "...stamping, hot or cold metals...includes exhaust system..." KIRCHHOFF's operates equipment that would also qualifies under R285 (vi) (B) and (C), in short, metal working processes with emissions released in plant or externally with proper control. The type of welding done is mainly resistance and gas metal arc welding. Bolts and screws can be welded to parts, or parts may have plastic or metal clips or connectors for wires welded on. Many of the welding operations are Robotic. Much of the welding is exhausted through JP 52-2 ESP particulate control units that presently are not

being operated/maintained.

In 2009, the Company indicated that 25,420 lbs of welding rod/wire was used during the year. They used a PM10 emission factor of 0.0052 lb PM10/lb wire consumed to come up with 132.184 lbs/year of PM10 emissions. In the most recent 12 month period, they used 306,076 pounds of welding wire which results in 1591 lbs/year.

An inspection of the roof was conducted. (See Photo/Attachment 6.) On the SW side of the facility, several newer stacks were evident that were surrounded by discolored roof gravel and at least one of the stacks was discolored/corroded as well. What caused the roof gravel discoloration was unknown but emissions from those stacks appeared to be coming from laser welding booths.

Prior to departing the facility, AQD Staff provided Ken with a DEQ Environmental Inspection brochure and a list of information to provide to AQD Staff via email. (All requested information was provided 2 days later.) Ken was also provided with a copy of the previous AQD inspection report for the facility. The Company was very cooperative during the entire inspection.

COMPLIANCE SUMMARY

KIRCHHOFF is in substantial compliance with Act 451 and the administrative rules at this time. However, they are not properly operating sixteen ESP's; only using the associated fans. It was not possible to determine if they are in compliance with opacity limitations since the exhaust gases are being diluted by the fans.

A letter of concern will be sent to KIRCHHOFF and a compliance plan will be requested to address this issue.



Image 1(4-3-2013 Roof Photo) : Attachment (1) Roof aerial photo taken from Google Earth dated 4-3-2013

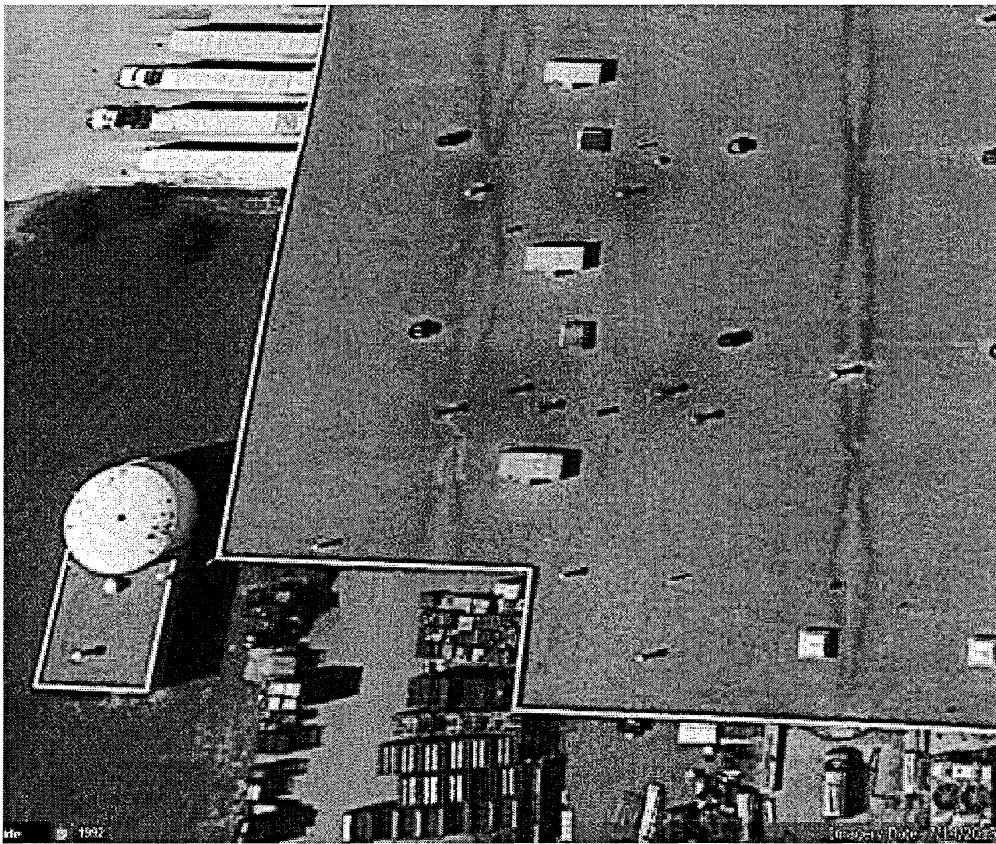


Image 2(7-14-2015 Roof photo) : Attachment (2) Roof photo from Google Earth taken 7-14-2015 showing additional stacks and roof discoloration. (Easiest to see in color version of photo.)



Image 3(Roof Discoloration): Attachment (6) Several relatively news stacks with rain caps were noted that were ducting emissions from laser cutting booths. Roof gravel and stack were discolored for unknown reason; either from an acidic emission or particulate emission.

NAME W Kovalchuk

DATE 10/17/2016

SUPERVISOR 