

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

N179028343

FACILITY: WILLIAMSTON PRODUCTS INC (SOUTH)		SRN / ID: N1790
LOCATION: 1560 NOBLE RD, WILLIAMSTON		DISTRICT: Lansing
CITY: WILLIAMSTON		COUNTY: INGHAM
CONTACT: Tom Bolton , Manufacturing Engineer		ACTIVITY DATE: 01/23/2015
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced, scheduled inspection of facility last inspected in 2008.		
RESOLVED COMPLAINTS:		

On 1/23/2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Williamston Products, Inc. (WPI), at their South facility.

Facility environmental contact:

Tom Bolton, Manufacturing Engineer; 517-655-2131, ext. 237, tomb@wpius.com

Facility description:

This facility performs assembly of automotive head rests, from component parts manufactured at other sites.

Emission units:

Emission unit	Emission unit description	Relevant exemption rule	Federal regulation, if applicable	Operating status
Furnace	Propane-fired furnace, for heating building, rated at 2,475,000 Btu/hr	Rule 282(b)(i)	NA	Compliance
Assembly processes	Various assembly processes for headrests	Not subject to Rule 201, because not sources of air emissions	NA	Compliance

Regulatory overview:

The facility does not have any air use permits. The assembly processes located here do not appear to emit air contaminants, and therefore do not appear to be subject to the requirement of Rule 201 to obtain an air use permit.

This facility does not appear to be subject to 40 CFR Part 63, Subpart OOOOOO, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production and Fabrication Area Sources. It assembles but does not actually manufacture polyurethane foam components. Those are produced at the WPI (North) facility, State Registration Number (SRN) N2496, which was inspected earlier today, and documented in a separate activity report.

Fee status:

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III.

The facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS). AQD's Operational Memorandum No. 13 provides guidance that facilities with volatile organic compound emissions greater than 10 TPY should be considered for inclusion in MAERS. Because only assembly operations and a small, propane-fired furnace are located here, emissions are likely to be less than that amount.

Location:

This facility is located in a very rural area, on the southwest side of Williamston. It is set back from the road, at the south end of group of small manufacturing buildings, with a creek dividing them. The surrounding area is residential and/or agricultural. The nearest residences are several hundred feet to the west, north, and east of the plant.

Note: The manufacturing buildings on the north side of the creek from WPI (South) are actually at a separate street address, 1530 Noble Road, and house the R.N. Fink Manufacturing Company. That facility was inspected by AQD staff in 2008.

Recent history:

WPI (South) was last inspected in 2008. It was closed during Michigan's recent economic recession, but with business increasing for WPI (North), it is now operating again. There is no record of any complaints ever having been received about this plant.

Arrival:

I first went to the WPI (North) facility, State Registration Number (SRN) N2496, where their main offices are. I met with Mr. Tom Bolton, Manufacturing Engineer. I presented my credentials, and provided him with a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, both according to AQD procedures. He provided me with a copy of their visitor orientation brochure, per their procedures. We conducted an inspection of WPI (North), documented in a separate activity report, and then drove here, to inspect WPI (South). Upon arrival, I could not see any visible emissions from the plant, nor detect any odors. Weather conditions were 32 degrees F and partly sunny, with winds out of the southwest at 10-15 miles per hour.

Inspection:

About 1/3 of the building is used for storage, about 1/3 for assembly operations, and about 1/3 for shipping and receiving. It is heated by a propane-fired furnace. The furnace is rated at 2,475,000 Btu/hr, and appears to be exempt from needing an air use permit, under Rule 282(b). This rule exempts:

(b) Fuel-burning equipment which is used for space heating, service water heating, electric power generation, oil and gas production or processing, or indirect heating and which burns only the following fuels:

(i) Sweet natural gas, synthetic gas, liquefied petroleum gas, or a combination thereof and the equipment has a rated heat input capacity of not more than 50,000,000 Btu per hour.

Assembly processes:

They assemble finished automobile headrests here, from components that are manufactured offsite. The plastic blow-molded headrests and polyurethane foam headrest components were manufactured at their WPI (North) facility. Metal U-shaped frames, and fabric covers for the headrests were manufactured elsewhere. There are about a half dozen assembly stations and "wrap" stations. The wrap stations are where the fabric or vinyl headrest covers are fitted to foam buns or headrests.

Steam is used on some of the fabric and vinyl covers to make it easier to work with, and to eliminate wrinkles from the material. The heat source for the steam is electric, rather than natural gas-fired. Vacuum is also applied during some of the wrap processes, to help the covers get fitted properly to the head rests.

Conclusion:

The facility's furnace appears to be exempt from needing an air use permit, and the assembly processes do not appear to emit any air contaminants. I could not find any instances of noncompliance, nor any

areas of concern. Facility staff were very helpful and professional. I left the site at 1:13 PM.

NAME [Signature]

DATE 2/27/2015

SUPERVISOR [Signature]