

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

N676338800

FACILITY: Sumitomo Electric Wiring Systems		SRN / ID: N6763
LOCATION: 27404 Drake Rd, FARMINGTN HLS		DISTRICT: Southeast Michigan
CITY: FARMINGTN HLS		COUNTY: OAKLAND
CONTACT: John King , DET Site General Manager		ACTIVITY DATE: 02/15/2017
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of a minor facility.		
RESOLVED COMPLAINTS:		

On February 15, 2017, I conducted an unannounced, scheduled, level 2 inspection of Sumitomo Electric Wiring Systems (SEWS), located at 27360 Drake Road in Farmington Hills, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); and the Air Pollution Control Rules.

I arrived on site around 9:00 AM. I met with Mr. John King, General Manager. Mr. King provided records and a walkthrough of the facility. I provided Mr. King with my contact information and explained the purpose of our unannounced inspections.

Opening Meeting

SEWS researches and develops electronic wiring for the automotive industry. Design, development, and testing of automotive electrical components occur at this facility. The facility has approximately 250 employees and operates from 8:00 AM to 5:00 PM Monday to Friday.

Building History

SEWS moved into the building in August of 2016. The previous tenant was SG Technologies. The last time the Air Quality Division (MDEQ-AQD) inspected this address was in 2006 when Dana Corporation was operating in the building. According to Mr. King and from my facility walkthrough, dynamometers that were associated with Dana Corporation have been removed from the facility.

The building address has been updated from 27404 Drake Road, when Dana Corporation was in the building, to 27360 Drake Road with SEWS in the building. According to the Assessor's Office in Farmington Hills, 27360 Drake is comprised of eight buildings with separate addresses, but the entire complex is technically located at 27360 Drake Road in Farmington Hills, Michigan.

Facility Walk-Through

Laboratory

We walked through the first floor laboratory, which included chambers for heat, cold, and vibration testing of components. Chambers are heated electronically. No chemical testing occurs on site. Also in the area were drill presses, saws, and mills. No equipment appears to vent to ambient air. Machining equipment appears to be exempt from obtaining a Permit to Install per R 285(2)(l)(vi)(B).

In place of the dynamometer that was on site when Dana Corporation used the building, SEWS installed an anechoic chamber in which to measure the frequencies and electromagnetic interference of electronic components. The unit does not appear to have air

quality concerns.

Emergency Generator Engine – 40 CFR Part 63 Subpart ZZZZ

SEWS brought over a diesel emergency engine from their previous location. According to Mr. King, the diesel tank is underneath the engine, and the generator is primarily used to provide emergency power for lights and computers. Because the engine was manufactured in May of 2005, the engine does not appear to be subject to 40 CFR Part 60 Subpart IIII per paragraph §60.4200(a)(2)(i). Per §60.4200(a)(3), engines *modified* or *reconstructed* after July 11, 2005 are subject to Subpart IIII; however the engine does not appear to meet the definitions of modified and reconstructed per §60.2 and §63.2 respectively.

The diesel emergency engine appears to be subject to 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. MDEQ-AQD does not have delegated authority to enforce this subpart per §63.6585.

Boilers

SEWS has several natural gas-fired boilers to provide building heat. Two natural gas-fired boilers have a maximum heat input of 4.188 million British thermal units per hour (MMBTU/hr) each, and another domestic boiler has a heat input value of 0.2 MMBTU/hr. These units appear to be exempt from obtaining a Permit to Install per R 282(2)(b)(i). The units don't appear to be subject to 40 CFR Part 60 Subpart Dc because the heat input value is less than 10 MMBTU/hr per §60.40c(a).

The two upper floors of the facility appear to be office space.

Compliance

Based on the AQD inspection and records review, it appears that SEWS is in compliance with the federal Clean Air Act; NREPA; and the Air Pollution Control Rules.

NAME Sam L.

DATE 3/3/17

SUPERVISOR SK