

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

.+35343		
FACILITY: Thai Summit America Corporation (was Ogihara)		SRN / ID: N1514
LOCATION: 1480 MCPHERSON PARK DR, HOWELL		DISTRICT: Lansing
CITY: HOWELL		COUNTY: LIVINGSTON
CONTACT: Jason Street , Enviro Compliance Manager		ACTIVITY DATE: 06/28/2016
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled yet unan	nounced inspection also serving as initial contact as the fa	cilities new inspector.
RESOLVED COMPLAINTS:		

Inspection Report N1514- Ogihara 1480 West McPherson Park Drive Howell, MI 48843

Inspection Date:

6/28/16

Facility Contacts:

Jason Street, 517-548-6067, jstreet@thaisummit.us

MDEQ AQD Personnel:

Nathan Hude - huden@michigan.gov, 517-284-6779

Facility Description:

(from website) Ogihara America Corporation is a majority-owned subsidiary of Ogihara Corporation (Japan). Ogihara America was established in Howell, Michigan in 1987 with the goal of supporting the sheet metal stamping and assembly needs of our North American customers. Our 796,000 square foot facility houses transfer and tandem press lines, tryout presses, assembly bays, tool and die services, warehousing space, and engineering and administrative areas. Our location in southeastern Michigan and ready access to interstate highways and railway lines enables us to efficiently service customers throughout the Midwestern United States and Ontario, Canada.

The facility employs approx. 715 employees and operates 7 days per week in 3 shifts for 24 hour operations.

Applicable Regulations:

-PTI 50-87 for facility roof vents, facility uses adhesive with low VOC according to permit application

-PTI 378-97A for two Caterpillar 3516 diesel generators as back up standby and peak shaving power, uses 275.6 gallons/hr. Apparently, this equipment has been purchased by DTE and thus the permit should be transferred ownership. Contact provided was Mike Wagner, 313-320-1894.

Voided Permits:

-PTI 378-97 voided to increase hours from 250/yr to 700/yr

Previous Inspections (within 5 years):

11/24/09, Ken Damrel, no issues noted

Previous Violations:

none

Violations Found During this Inspection including reoccurring: none

Recent Complaints (within 2 years):

none

MAERS Reporting

na

MAERS Emission Unit List none

Inspection Summary

l arrived at Thai Summit around 8:30 am for a scheduled, unannounced, initial contact (as inspector) inspection. It was overcast with light winds out of the North West; upon entering the parking lot and the building I did not detect any odors or see any visible emissions.

I signed in at the front entrance with the security guard and Jason met me shortly thereafter. I informed him on the reason for my visit while providing him with a copy of our inspection brochure, the boiler card, and my business card. We went to a nearby conference room where we reviewed the brochure and the boiler MACT card. We also took some time to review and discuss the PTI's that are active for Thai Summit. At this point, Jason informed me that the engines associated with PTI 378-97A have been acquired / purchased by DTE and provided me with Mike Wagner's contact information. Jason stated that Thai Summit no longer has any control over the engines, though they still reside on Thai Summit property. A phone call was made to Mike on 7/6/16 and found that he is out of the office until 7/11/16. The permit will require transfer of ownership and possible creation of a new SRN, further information will be written in a separate report.

The facility has two boilers that are used for bathroom and office hot water. These boilers are exempt from 40CFR63 6J due to being an area source of HAPS and the boilers being natural gas per 63.11196(e). The rest of the building uses on demand water heaters and natural gas heaters in the warehouse. From the south end of the building when looking from the highway, there are 2 or more vents to the natural gas Reverb / Dayton heaters. These vents have black soot around them that I had noticed from the highway. When asked Jason stated they had mechanical issues with the heater in the winter thus causing soot, yet the heaters have since been fixed. We looked at the heaters and vents as part of this inspection.

On the facility floor we went to all of the stamping/pressing lines. The facility makes roofing for Chrysler, Freightliner, trunk lids or tailgates for Chrysler Caravans, Dodge truck floor panels, and more. The components are steel and aluminum depending on the manufacturer and model. The Chrysler caravan tailgate has a magnesium interior and aluminum exterior shell. These components are pressed at another location in the plant and then either the edges are rolled to create the seam or possibly spot or laser welded. Some components require the application of adhesive which is part of PTI 50-87 as found in the permit application. The adhesive used depends on the vehicle, vehicle part, and purpose; some is used as a water proofing sealant, glue, or for noise reduction. All of the welding operations are captured by a ventilation system and then vented back into the building.

The press department has 6 operating presses, 1 additional press is in the process of being installed. The largest installed and operating press is 2700 tons and contains 5 dies. The dies are produced overseas in either Korea or Japan, yet Thai Summit is capable of making minor repairs in their shop when needed. The die repair area has an oven that is vented inside the building. One of the presses utilizes a lubricant that is applied as a mist to the metal before being pressed. This lubricant has a trademark name of "Chempet". The facility stores this product in a 8,500 tank. The sump that collects the waste Chempet drains to a 10,000 gallon tank that is mixed with waste water and treated as non-hazardous oil/water waste. Both tanks are exempt per 284(i).

PTI 50-87 has three special conditions that appeared to be in compliance. There is not a requirement for estimating VOC emissions, thus I computed this figure using data provided by Jason. My estimate calculated to 9.53 tpy of VOC for all adhesives and the lubricant spray. This level is well below significant emission rates.

It appears that this facility is in compliance with all requirements of the applicable permit.