

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

N7573

N757336309

FACILITY: Magneti Marelli Exhaust Systems, North America, LL		SRN / ID: N7573
LOCATION: 5600 BOW POINTE DR, CLARKSTON		DISTRICT: Southeast Michigan
CITY: CLARKSTON		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 09/02/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2016 Inspection of Magneti Marelli Exhaust Systems, North America, LLC, Magneti, Marelli, FIAT S.p.A. ("Magneti")		
RESOLVED COMPLAINTS:		

N7573 - SAR - 2016 09 02

Magneti Marelli Exhaust Systems, North America, LLC (N7573)
Magneti Marelli, FIAT S.p.A.
5600 Bow Pointe Dr.
Clarkston, Michigan 48346-3115

SRN Reassign (2015): Recticel Interiors North America, LLC. (N7573). Reaction Injection Molding (RIM) instrument panel / dashboard skin manufacturing company → Magneti Marelli Exhaust Systems, North America, LLC (N7573). Unlike Recticel (ROP opt-out PTI No. 106-11), Magneti is not a MAERS source. Magneti will move (by Dec 2016) its exhaust systems business to Mexico and bring automotive lighting business to this Clarkston facility.

PTI void: ROP opt-out PTI No. 106-11 was voided on November 15, 2012, as a result of Recticel's plant closure due to loss of business. Please refer to September 25, 2012, e-mail stating that Recticel ceased all operations at Clarkston and that all process equipment was removed and also to October 31, 2012, inspection report. All Recticel files must be marked "out of business". Recticel obtained ROP opt-out PTI No. 106-11 for failure to promptly submit 208a registration. However, Recticel is operating as Recticel Urepp NA, Inc. (Mr. Ronald Maxson) at 1653 Atlantic Boulevard, Auburn Hills, MI 48326-1503.

On September 02, 2016, I conducted a level 2 self-initiated annual inspection of Magneti Marelli Exhaust Systems, North America, LLC, Magneti, Marelli, FIAT S.p.A. ("Magneti"), an Exhaust Systems design, engineering, production company serving big three automotive companies (especially, FCA USA LLC (Chrysler)), located at 5600 Bow Pointe Dr., Clarkston, Michigan 48346-3115. The inspection was conducted to determine compliance with the Federal Clean Air Act (CAA); Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 (PA 451); and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

FY 2016 inspection is a follow-up inspection for goose neck obstruction issue for discharge of particulate laden exhaust gases.

During the FY 2016 inspection, Mr. Antonio Vozzolo (Phone: NA; Cell: 248-238-5269; E-mail: Antonio.Vozzolo@MagnetiMarelli.com), Plant Manager, and Mr. Rubinder Singh (Phone: 248-418-3085; Fax: 248-922-2222; Cell: 248-238-0724; E-mail: Rubinder.Singh@MagnetiMarelli.com), EHS Specialist, assisted me.

Ms. Raj Dhillon (Phone: 248-418-3221; Fax: 248-922-2222; Cell: 734-546-2526; E-mail: Raj.Dhillon@MagnetiMarelli.com), HR Manager, was present but did not participate.

Magneti Marelli, FIAT S.p.A. is an Italian company employing about 80 at this Clarkston location. Founded in 1919, Magneti (2015 sales: 8.1 billion dollars) is world-wide automotive parts supplier with 38,000 employees, 89 manufacturing facilities, 12 R & D Centers, 26 Application Centers in 19 countries. Magneti's business areas are: automotive lighting, powertrain, electronic systems, suspension systems, exhaust systems, plastic components and modules, aftermarket parts, motor sports, etc.

Magneti's Clarkston plant at this time (FY2016) is dedicated to exhaust systems (moving shortly to Mexico). This is 120,375 square feet manufacturing facility. The plant manufactures hot end exhaust manifolds integrated with catalytic converters for automobiles. e.g., 2,4 Tigershark Manifold, 2,4 Tigershark Maniverter, 2,4 Tigershark Converter Can, etc.

Move to Mexico - Exhaust Systems

As car (Chrysler 200) manufacturing ended at FCA's Sterling Heights Assembly Plant (SHAP), to be replaced by truck assembly upon building new paint line for truck boxes, (all American small car manufacturing is moving to Mexico), Magneti will move its exhaust systems manufacturing to Mexico in a couple of months. Magneti will move automotive lighting business to this Clarkston plant.

Canning machine

Weil Engineering (WE) canning machine with welding is present. All exhaust released to in-plant environment. The machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l) and 336.1285(i) (welding).

Cutting, bending machines

Cutting, bending machines are present. All exhaust is released to in-plant environment. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

Aqueous parts washer

One Aqueous Safety-Kleen NASCAR Performance parts washer is present. ArmaKleen 4 in 1 cleaner solution is used. The parts are washed in the water-based parts washing machine operating at 164 °F. A mechanically assisted lid is present. Safety-Kleen replaces the cleaning solution once per week.

Welding

Six robotic welding cells (3 lines) and six torch welding cells (3 lines: Mig welding – Argon) are present. All welding machines exhaust via one common manifold and 50-foot stack with a goose neck obstruction to vertical discharge of particulate laded exhaust gases.

During the FY 2015 inspection, Mr. Vozzolo stated that the company would replace goose neck rain protection with a no-energy-loss rain protection sleeve at the top of the stack. Unobstructed vertical discharge of exhaust gases will result in better dispersion of air contaminants; goose neck or elbow results in contaminants downwash. AQD sent the design information. Also, during the FY 2016 inspection, we discussed an option of installing proper air filtration device and recycling cleaned air into the plant. Such reuse of the building air would save HVAC costs. However, exhaust system business will be moved to Mexico shortly and hence no improvement will be done.

The welding machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(i).

Conclusion

Exhaust Systems manufacturing will move to Mexico in a couple of months. All process equipment are exempt from Rule 201 as they satisfy conditions of exemptions pursuant to Rules 285. Magneti will move automotive lighting business to this Clarkston plant.

NAME

R. K. Kananahalli

DATE

09/06/2016

SUPERVISOR

Joye

