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

FACILITY: BRIDGEWATER INTERIORS LLC		SRN / ID: N8331	
LOCATION: 7500 TANK AVE, WARREN		DISTRICT: Southeast Michigan	
CITY: WARREN		COUNTY: MACOMB	
CONTACT: Ray Johnson , Lead EH&S Specialist		ACTIVITY DATE: 02/12/2016	
STAFF: Francis Lim	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR	
SUBJECT:			
RESOLVED COMPLAINTS:			

On February 12, 2016, Jim Day (OWMRP) and Francis Lim conducted a joint inspection at Bridgewater Interiors, LLC located at 7500 Tank Avenue, Warren, Michigan. The purpose of the Air Quality Division's inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Administrative Rules.

Ray Johnson, Lead EH&S Specialist represented the facility during the inspection.

Bridgewater Interiors is a joint venture of Epsilon Technologies, LLC with Johnson Controls. This facility is a Tier I automotive seating supplier. It is strategically located in close proximity to its customers. Just-in-Time manufacturing means that some of their products can reach their customers within 3 to 4 hours after assembly. This facility operates 24/7, six days a week and supplies Ford Motor Company and Chrysler Corporation. It has approximately 800 employees on site.

Because of Just-in-Time manufacturing, facility operates emergency diesel electric generators to supply electric power during a blackout/brownout.

This facility assembles automotive seats using manual labor and robots. There are three lines producing the bucket seats and bench seats. The seats are assembled as it goes through the assembly line using a conveyor roller. Production starts with the seat frame and as it passes to the next station different components are added. Robots are used for more sensitive and delicate operations. This is a labor intensive operation.

There is no coating or solvent wiping operations in the assembly line. This facility used to have an operation involving glue application in the manufacturing of headliners. This process is now gone.

An aqueous cold solvent cleaner is used in the maintenance department. The maintenance department has small cutting/grinding/drilling operations as well as a small MIG (metal inert gas) welding. There is a can puncturing process to remove the residual liquid from aerosol cans containing coatings and lubricants. This can puncturing equipment emit indoors.

The facility has three diesel engine electric generators (Caterpillar and two Generac) to provide electric power if the utility grid is not available. The diesel engine generators were installed in February 14, 2004. Since Bridgewater Interiors is a Just-in-Time operation, it is important that electric power is always available for their assembly operations. The caterpillar engine is no longer operating and will be removed. The facility has switched to LED lights - less power is necessary for plant operations. The emergency diesel engine generators are subject to the area source RICE MACT (quad ZZZZ). Ray is aware of the regulations and is complying with the area source MACT. An outside contractor PM Technologies conducts a semiannual and annual preventive maintenance on the generators. An oil change (conducted 1-19-2016), air cleaner inspection, and hoses/belts inspection is conducted annually. An hour meter is installed. For 2015, Generac #1 run for 42 hours; Generac #2, 41 hours; and Caterpillar 8 hours.

On September 18, 2009, opacity as high as 100% was noticed from one of the diesel generators. Facility was conducting a 4-hour load test. The high opacity was attributed to the lubricants and rust inhibitors that ended up in the combustion chamber. A Notice of Violation was issued for this occurrence.

Bridgewater Interiors is a minor source of air emissions.

02-15-16 J. 1.2

http://intranet.deq.state.mi.us/maces/WebPages/ViewActivityReport.aspx?ActivityID=245... 2/16/2016

MACES- Activity Report

Daga	\mathbf{n}	-f	
Page	4	012	

AME	DATE	SUPERVISOR	••••••••••••••••••••••••••••••••••••••
:			
~			· · · ·
•			,
· ·			
			<u>.</u>
. ·		•	
-		· · · · · · · · · · · · · · · · · · ·	
	-		
· · · ·			