

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

B419834219

FACILITY: BORGWARNER THERMAL SYSTEMS, INC.		SRN / ID: B4198
LOCATION: 1100 WRIGHT ST, CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT:		ACTIVITY DATE: 04/07/2016
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance Inspection.		
RESOLVED COMPLAINTS:		

I conducted an inspection of Borg-Warner Thermal Systems (BWTS) to determine compliance with PTI 211-04 and the Air Pollution Control Rules. PTI 211-04 is a general permit for coating operations. I met with Mr. Steve Towner and Mr. Russell Norkoli who is the new environmental contact.

Prior to conducting the inspection I observed the plant from off-site. Weather conditions were cold (30 degrees) with overcast skies and North winds. I did not detect any odors or visible emissions outside the plant.

BWTS is still manufacturing engine fan clutch Assemblies for the truck industry and ventilation "shutters" for the railroad engine manufacturing industry. Air emissions from the source are primarily generated from two coating spray booths, Booth #4 for fan clutch and Booth #3 for shutters. PTI 211-04 is a general permit for coating processes. A third spray booth was added to the general permit on 7/10/2012 but this booth was actually a replacement for old booth #3. A paint booth that was used in the fan clutch production line was removed as of May 2009. Also, a powder coating booth and oven have also previously been removed.

The clutch spray booth is located centrally in the plant and had a stack exiting the roof directly above the booth. The booth was equipped with a two stage filter. The condition of the filter was good. The paint booth was in operation at the time of the inspection with an HVLP spray gun and capture appeared to be excellent. Paint and lacquer thinner are stored in cabinets adjacent to the booth. The painter each shift mixes any necessary paints weighing each component and recording the type and weight of each paint and the lacquer thinner on a log sheet. Paint usage can carry over from shift to shift. All waste coatings and reducers were stored in closed containers.

The "shutter" spray booth is located on the east side of the plant and has an exhaust stack that exits horizontally through the side of the building then turns vertical. This booth was also equipped with two stage filters that were in good conditions. HVLP guns are also used in this booth as required. Paint for this booth is obtained and weighed in the paint storage area near the clutch booth. The paint use log forms indicate which booth the paint is used in.

The plant also contains an aqueous wash system that originally was used to prepare metal for the powder coating booth. The wash system is heated by a 1 MMBtu gas fired heater. Also, there is one small mineral spirits cold cleaner that is equipped with an automatic closing lid. The air/surface interface is less than 10 sq. ft.

Following my inspection of the processes I reviewed records with Mr. Norkoli. I observed the paint/thinner use logs each painter fills out daily. Most of the coating usage plant-wide is one color of lacquer paint identified as "Kysor Blue". Additionally, there is one primary solvent used as a reducer and cleaner. The solvent is identified as "Lacquer Thinner". Black paint, primer, naphtha, and butyl acetate are also used. MSDS sheets for the materials were obtained following the inspection. The log sheets have provisions for each coating and the painter enters the weight used. This data is transferred into a spreadsheet that contains the VOC content for each coating and calculates the VOC emissions. A copy of the current summary spreadsheet is attached. The records indicated that VOC emissions are well below the 2000 lbs./mos./10 TPY limits for each booth and 30 ton per year limits for all booths.

It has previously been determined BWTS does not use coatings containing chromium, lead, manganese, nickel, cadmium and as a result are not subject to the Surface Coating of Miscellaneous Metal and Plastic Parts MACT, Subpart HHHHHH. MSDS sheets for the paint did not indicate the presence of these hazardous compounds.

BWTS is a true minor source of air emissions and is no longer required to submit annual reports of air emissions.

As a result of the inspection it appears that BWTS is currently in compliance with PTI 211-04 and the Air Pollution Control Rules.

NAME  DATE 4/14/2016 SUPERVISOR 