

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

B755837737

FACILITY: Flex-n-Gate		SRN / ID: B7558
LOCATION: 10250 F. Drive N, BATTLE CREEK		DISTRICT: Kalamazoo
CITY: BATTLE CREEK		COUNTY: CALHOUN
CONTACT: Brian Neumann, EHS Coordinator		ACTIVITY DATE: 11/09/2016
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On November 9, 2016, MDEQ-AQD staff arrived at Flex-N-Gate (hereafter facility) at 9:10 am to conduct an unannounced air quality inspection. The facility premises are fenced and staff made initial contact with the security office and stated the purpose of the visit and provided the guard with a business card. After a few minutes, staff was directed to the front entrance and was met by Mr. Brian Neumann, EHS Coordinator and Mr. Rich Rocho, Maintenance Supervisor. Staff again stated the purpose of their visit and we went to Mr. Neumann's office for further discussions.

The main manufacturing area is about 80,000 ft² and the facility sits on approximately 70 acres with the balance area leased for crops planted by area farmers. The facility is on a well and pre-treats their wastewater on-site prior to discharge to the City of Battle Creek wastewater system. The facility has about 150 associates and operates two 8-hour shifts (6:30 – 3 pm; 3 – 11:30 pm), five days per week. The facility is an OEM supplier of automotive parts to domestic and foreign automakers. The bulk of facility manufacturing is stamping of large and small parts from steel and aluminum stock rolls with small assembly of stamped parts and testing of finished brake assemblies. Staff asked about a recent article in the Battle Creek Enquirer about a \$ 22.3 M dollar expansion at this facility and Mr. Neumann indicated that it involves removal of smaller metal die presses and replacement with much larger presses for upcoming product changes and replacement of manual welding stations with robotic welding cells. The expansion will result in a third shift being added sometime in 2017.

Staff asked if there is any painting of manufactured parts at this facility and Mr. Neumann said that some of the small brake parts are sent to their Grand Rapids facility for e-coat and then returned for assembly but no surface coating is done at this facility. Staff asked if the facility had any boilers, emergency generators or cold cleaners and Mr. Rocho answered in the negative for all three items. The facility has roof mounted air handling units for the main building and uses gas fired space heaters in the warehouses. Staff asked if there is any plastic injection molding equipment on-site and Mr. Neumann said no. Staff then asked if there is any rust preventative applied to the finished stamped products and Mr. Neumann said none is applied but the parts may have some residual stamping die oils on them. Staff asked for the quantity of die oil that is used on an annual basis. The facility purchases a concentrate product that is mixed with water prior to use in the stamping presses. Between 1/1/15 and 9/30/16, the facility purchased approximately 4,000 gallons of draw lube concentrate (see attached spreadsheet).

Staff was then given a tour of the facility. Required PPE is safety glasses, boots and hearing protection. The main manufacturing room contains a number of metal stamping presses and manual and robotic welding cells. The stamping presses are exempt from air use permitting requirements under Rule 285(I)(i). The manual and robotic welding cells are exempt from air use permitting requirements under Rule 285(i). Argon gas storage and evaporation equipment associated with the welding cells is exempt from air use permitting requirements under Rule 285(II). The on-site wastewater treatment system consists of an oil/water separator, settling tanks and a filter press that is exempt from air use permitting requirements under Rule 285(m). The maintenance and production area has small grinders and/or polishers for die pattern repairs or to remove burrs from stamped parts and this equipment is exempt per Rule 285(I)(vi)(B).

The facility has a small Destructive Test Area (DTA) room in the northeast corner of the manufacturing building. Testing equipment includes a plasma cutter, air hammer and a chop saw that are used to destruct parts and process emissions are routed to a cyclone and then discharged to the outer air. Staff informed Mr. Neumann that the DTA process equipment did not currently comply with the associated air use exemption Rule 285(I)(vi)(C) to vent to the outside air because the exhaust air would first have to be routed to a mechanical pre-cleaner and then to an appropriately designed and operated fabric filter control system. Mr. Neumann asked if there were any other options and staff stated that if process emissions were routed back in-plant, the equipment would be exempt per Rule 285(I)(vi)(B). Staff further stated that if the facility agreed to this change and took prompt corrective actions, staff would use discretion and not cite the facility in violation of Rule 201. On November 14, 2016, Mr. Neumann emailed photos to staff showing the before and after photos of process emissions being

routed back in-plant (copy of documentation attached to this inspection report).

Staff left the facility at 11:10 am. At the time of the inspection and based on prompt follow-up corrective measures taken to re-route DTA process emissions back in-plant, all process equipment is currently in compliance with applicable air use exemption rules. -RIL

NAME RIL

DATE 11/28/16

SUPERVISOR MA 11/30/2016