

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

N049037904

FACILITY: Adient		SRN / ID: N0490
LOCATION: 76 ARMSTRONG ROAD, BATTLE CREEK		DISTRICT: Kalamazoo
CITY: BATTLE CREEK		COUNTY: CALHOUN
CONTACT: Carrie Case, Environmental Health and Safety		ACTIVITY DATE: 12/06/2016
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On December 6, 2016, MDEQ-AQD staff arrived at Adient (fka Johnson Controls) located at 76 Armstrong Road, Battle Creek, MI at 10:45 am to conduct an unannounced air quality inspection. Staff made contact with Ms. Carrie Case, EHS Coordinator and stated the purpose of the visit and provided her with a business card. Staff asked about the facility name change and Ms. Case said that Adient completed separation from Johnson Controls in November 2016.

The facility was last inspected by the AQD on 1/23/2007 and was determined to be in compliance at that time. The facility continues to manufacture the framework or "hearts" for automobile vehicle seat assemblies. Staff asked and Ms. Case stated that the facility has about 450 associates and they operate three production shifts per day five days per week with occasional weekends. Required PPE for AQD staff was safety glasses and steel toed boots, hard hat and hearing protection in order to enter the press room.

Staff asked and Ms. Case stated that the facility did not have any boilers (i.e. uses gas fired space heaters). The natural gas fired space heaters are exempt from air use permitting requirements under Rule 282(b)(i). The facility has an old emergency generator on the east end of the main building that is disconnected from electrical and fuel supplies and is labeled not to be used by Environmental staff.

Ms. Case then gave staff a tour of the facility. The press room has one 1000 ton press and two 800 ton presses that stamp parts out of rolled steel stock. The presses are exempt from permitting requirements under Rule 285 (l)(vi)(B). The facility has nine automated laser welding stations that exhaust to internally vented cartridge filter collectors. The associates manually load parts on to a removable die and then the parts are clamped prior to being welded together by the laser. An outbuilding on the north side of the main building has a manual welding booth that exhausts outside. The welding equipment is exempt from permitting requirements per Rule 285(i).

Assembled hearts for Chrysler products are routed to an autophoretic (aka autodeposition) dip coating line. This method is used to apply a layer of anti-corrosive paint to metal using a chemical reaction. The hearts are dragged through two heated alkaline cleaning solution tanks and then through a municipal water rinse followed by a reverse osmosis (RO) rinse prior to the coating dip tank. In the coating dip tank, the acidic solution liberates ferrous ions from the metal part which destabilizes the emulsion locally at the metal surface causing the paint layer to be deposited. Excess coating is removed from the hearts in a water rinse before a reactive rinse is used to activate the coating. The activated coating goes through a final RO rinse and then is sent to a natural gas fired drying oven to cure the coating. The dip coating line is considered to be exempt from air use permitting requirements per Rule 285(r)(i). The drying oven is exempt per Rule 282(b)(i). There is a 6" high berm around the coating line that is designed to capture the volume of one tank in the event of a leak or spill. Wastewater generated by the coating line is monitored for pH and is adjusted as needed prior to discharge to the municipal wastewater system.

The facility has one cold cleaner that is exempt from air use permitting requirements per Rule 281(h). The cold cleaner did not have a cover. The current cleaning solution (Aquatene GM390) contains 0.0% volatile organic compounds per the attached product SDS, therefore the equipment is not currently subject to Part 7 rules for organic solvents that would require the use of a cover.

Staff left the facility at 11:50 am. At the time of the inspection, all process equipment described above is compliant and exempt from air use permitting requirements. -RIL

NAME RIL DATE 12/12/16 SUPERVISOR ma 12/12/2016