

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

P054334279

FACILITY: Mobis North America, LLC		SRN / ID: P0543
LOCATION: 6401 West Fort Street, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 04/14/2016
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Compliance inspection of the Mobis North America, LLC facility in Detroit. The Mobis facility is scheduled for inspection in FY 2016.		
RESOLVED COMPLAINTS:		

Location:

Mobis North America, LLC
6401 West Fort Street
Detroit, MI 48209

Date of Activity:

Thursday, April 14, 2016

Personnel Present:

Steve Weis, DEQ-AQD Detroit Office
Todd Zynda, DEQ-AQD Detroit Office
Shamille Goins, EHS Assistant Manager

Purpose of Activity

A self-initiated inspection of the Mobis North America, LLC (hereinafter "Mobis") facility was conducted on Thursday, April 14, 2016. The Mobis facility was on my list of sources targeted for an inspection during FY 2016. The purpose of this inspection was to determine compliance of operations at the Mobis facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and with applicable Federal air quality standards. In addition, Todd Zynda and I were tasked with visiting sources in this area of Detroit and checking whether they use any materials that contain 2-ethylhexanol; this was due to ambient air concentrations of this compound that were measured via summa canister sampling at the site of the former Southwestern High School between September 3rd and November 2nd, 2015.

Facility Site Description

The Mobis facility is located on the south side of Fort Street, east of the intersection with Waterman Street. The facility is located in a portion of the former Arvin Meritor complex on the south side of West Fort, extending from Waterman to the east approximately 325 yards to a street called Reissman; this street separates the facility from the building next door, which houses Evans Distribution Systems/Progressive Distribution (6307 W. Fort St.).

Mobis, which is affiliated with Hyundai, has been operating at this location since 2010. They originally leased the office and manufacturing space from Arvin Meritor, and now have a similar lease agreement with the current owner of the former Arvin Meritor property, Sakthi Automotive Group USA. The north part of the building, which fronts W. Fort St., contains offices. The office portion of the Mobis facility is located in the northeastern corner of the complex (Sakthi has separate offices in another portion of the office complex). The manufacturing portion of the Mobis facility is located in a 211,000 square foot building at the east end of the complex, right in back of and adjacent to the office area.

Mobis, which is affiliated with Hyundai, is a separate entity from Sakthi, having its own separate ownership and management. As such, even though the Mobis operations are located in a building owned by Sakthi, these two facilities are considered separate stationary sources. Mobis also operates a technical center facility in Plymouth (46501 Commerce Center Drive), and a production facility in Toledo near the Fiat-Chrysler Toledo Assembly Complex.

Facility Operations

The Mobis facility is an automotive parts supplier; the facilities in Detroit and Toledo currently provide parts to Fiat-Chrysler. Front and rear suspension modules, or cradles, are assembled at the Mobis Detroit facility, and the assembled suspension components are shipped to Fiat-Chrysler's Jefferson North Assembly Plant in Detroit for use in the Grand Cherokee. The suspension components are assembled on a "just in time" build schedule, ordered to be completed and shipped to Jefferson North as they are needed. As such, the Mobis facility's hours of operation match up with the Jefferson North Plant – 6-7 days per week, with at least 2 shifts per day. This Mobis facility currently has around 600 employees.

All of the parts that make up the suspension modules are shipped in to the Mobis facility; none of the parts are forged, stamped or otherwise created at this facility. As well, none of the parts, or the finished suspension assemblies, are painted or coated in any way at this facility.

As previously mentioned, the facility includes an office area in the front/Fort St. side of the facility. The rest of the facility consists of the assembly and warehouse areas. The assembly and warehouse area consists of a 211,000 square foot building; a 35,000 square foot building addition was constructed for extra parts storage and staging, which brought the total square footage to 211,000. The warehouse, storage and staging area is located in the rear of the facility.

The portion of the facility in which final parts assembly takes place is located between the office area in the front and the warehouse area in the back. The front portion of the assembly area (adjacent to the office) contains the rear line, which is where the rear suspension is assembled, while the back portion of the assembly area contains the front line, where the front suspension is assembled. Parts to be assembled are sequenced from the warehouse, go through a "kitting" in which they are grouped for assembly and placed in racks, which in turn are sent to the final assembly area. The final product leaves the facility via the loading docks adjacent to the assembly area.

Inspection Narrative

Todd and I arrived at the facility at 1:40pm. We checked in at the main entrance of Sakthi, and we were met by Shamille Goins of Mobis' Environmental Health and Safety. We proceeded to a conference room in the office area of the Mobis facility. We met for a short time for introductions, during which I provided the purpose of our visit. The Mobis staff provided us with some background information regarding the facility. We discussed how long Mobis has operated at this site, how many employees work at the facility, what the typical days/hours of operation are, and the type of product manufactured at the facility. We also discussed the 2-ethylhexanol air monitoring results. Shamille stated that she could not think of any material in use at the facility that would utilize this compound. I provided her with some information about the compound, and she told me that she would let me know if she found any potential sources of this compound at the Mobis facility.

After our initial discussion, we walked out to tour the facility. We walked through the office portion of the facility, and entered the manufacturing area where we observed the assembly lines for the rear suspensions. As we observed, parts from a rack were put into place to begin the assembly process to produce a final part for use in the Grand Cherokee rear suspension. As we walked through the assembly area, I inquired about how the facility is heated and cooled. I was told that the facility is climate controlled via typical forced-air units that provide comfort heating and cooling; there are no boilers on site. I asked if Mobis has any emergency generators, and I was told that Mobis does not, but that there is one outside of the building that was there when Mobis began operating at this site; it is presumed that this generator was installed by Arvin Meritor when they owned the building.

We then walked into a repair and maintenance area, which is located at the west side of the building, roughly between the rear and front assembly lines. This area is used to repair components of the assembly lines. There are some drill presses, saws, and other metal repair items in this area. There is also a small parts washer in this area that is maintained by Safety Kleen. We were told that Arma Kleen 4 in 1 cleaner is used in the washer. A copy of the Safety Data Sheet for this material is attached to this report.

We then walked to the back portion of the building and walked through the warehouse area. There were some parts stored in this area, and it was otherwise relatively open. We then walked along the east side of the building, and stopped at the room that is used to stage wastes ranging from universal wastes to liquid/chemical waste. There is a small storage tank in this room that was there prior to Mobis operating at the site. The tank is labeled as being empty, and the label is dated 6/21/2007. We were told that Mobis has not used this tank.

On our way back to the office area, we observed portions of the front and rear assembly lines from the east side of the building. We returned to the office area and concluded the tour of the facility. After some brief question and answer and parting comments, Todd and I left the facility at 2:43pm.

Permits/Regulations/Orders/Other

The Mobis facility does not currently possess any air quality permits from DEQ-AQD. Based on what I observed during my site visit, the processes and operations at the Mobis facility appear to be exempt from the requirement to obtain a Permit to Install from DEQ-AQD.

The equipment used to heat the facility meets the exemption requirements of Administrative Rule 282(b)(i) (Rule 282(b)(i)) due to the small size of this equipment.

The assembly operations are exempt. Assembly type operations are typically exempted from permit requirements through meeting the exemption criteria of Rule 285(l)(vi). This provision exempts equipment used for various machining operations of metal products that is vented to the general in-plant environment. In the case of the Mobis assembly operations, the parts are simply put in their appropriate place and assembled, and there did not look to be any specific drilling or turning operations at this time, which would truly be exempt from permitting requirements. As mentioned previously in this report, at this time, there are not coating operations associated with the production activities, and the parts are not cast or stamped at the Mobis facility. We were told that some spot welding takes place to repair racks as the need arises; welding is exempt per the provisions of Rule 285(i).

Compliance Determination

Based upon the results of the April 14, 2016 site visit, the Mobis North America LLC facility in Detroit appears to be **in compliance** with applicable state and federal regulations. At this time, all of the operations at the facility are exempt from DEQ-AQD permitting requirements.

NAME Stef Weis DATE 9/6/16 SUPERVISOR JK