U-63-16-11144 DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated Inspection F1/2016 ZhSp-**ACTIVITY REPORT: Self Initiated Inspection**

| LOCATION: 24505 Indoplex Circle | |
|--|------------------------------|
| LUCATION: 24505 Indoplex Circle | DISTRICT: Southeast Michigan |
| CITY: Farmington Hills/ | COUNTY: OAKLAND |
| CONTACT: | ACTIVITY DATE: 09/27/2016 |
| STAFF: Iranna Konanahalli / // COMPLIANCE STATUS: Compliance | SOURCE CLASS: |
| SUBJECT: FY 2016 inspection of Kern-Liebers USA, Inc. ("Kern" or "Kern-Liebers") | |

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Kern-Liebers USA, Inc. (U-63-16-11144) A Kern-Liebers Group Company 24505 Indoplex Circle Farmington Hills, Michigan 48335-2523

Permit-to-Install: Rules 285, 287 exempt process equipment

On September 27, 2016, I conducted a level-2 self-initiated inspection of Kern-Liebers USA, Inc. ("Kern" or "Kern-Liebers"), a Kern-Liebers Group Company, located at 24505 Indoplex Circle, Farmington Hills, Michigan 48335-2523. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Ryan Kiblawi (Phone: 248-427-1100-ext. 406; Fax: NA; Cell: 419-490-4914; E-mail: Ryan.Kiblawi@KL-usa.com), Vice President, assisted me.

The inspection was conducted as result of August 05, 2016, smoke (up to 60% opacity) incident.

Kern-Liebers, headquartered (HQ) in Germany, is in a business of manufacturing precision springs of variety of sizes (0.1 – 4.0 mm) for predominantly automotive industry.

Spring making machines

About twenty five (25) spring making machines are present. The machines are imported from Germany. Each (except a couple of machines) machine is equipped with its own dedicated electrically heated stress relieving oven. The machines are fed wires (SS, carbon steel). None is equipped with an exhaust system to outside ambient air. Most painting is outsourced.

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 (I).

Shot peening

One OMSG shot peening machine is present. Shot peening increases strength of springs. The machine is equipped with an enclosure such that all steel shot is captured. Thus captured shot is reused. The machine is NOT equipped with an exhaust system to outside ambient air.

The shot peening machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I).

Dip spin painting

One dip spin painting machine is present. It consists of one \approx 80-gallon tank, which is also used as a paint mixer, and a perforated basket to hold springs to be painted. Water based paint is diluted with water: 1 part concentrated paint : 3 parts diluent water. The paint and water are mixed in the \approx 80-gallon tank such that paint is homogeneous. The springscontaining perforated basket is immersed in the paint and raised above the paint liquid level and spun to remove excess paint from thus painted springs such that paint is captured using centrifugal forces due to spinning and reused. The \approx 80-gallon tank is equipped with a mechanically-assisted lid that is used to prevent spill (s) while operating the spinner.

The painted springs are baked at ≈300 °F using one of two natural gas fired ovens (Precision Quincy Corp.; Model No. 72-1,000; Serial No. 14,449; Mfg Date: June 27, 2001). Each oven is equipped with its own dedicated exhaust stack. The ovens are also used for springs stress relieving purposes (up to 900 °F).

About 5 gallons of undiluted water based paint are used per month; as stated above, diluent is water. The dip spin paint machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(c). As transfer efficiency of the machine is practically 100 percent (no overspray), a filter system is not needed.

One tumbler is present to separate sticking springs due to painting. Neither dip spin machine nor tumbler is equipped with an exhaust system. Most painting is outsourced.

August 05, 2016, smoke incident

From Grand River and Drake intersection, I observed up to 60 percent opacity smoke on August 05, 2016. Smoke was continuous for over 20 minutes from 11:25 am. The smoke was coming from one of two natural gas fired ovens based upon September 27, 2016, inspection. I asked Mr. Kiblawi to investigate the incident.

Conclusion

The machines are exempt from Rule 336.1201 (Permit-to-Install) per Rules 336.1285, 336.1287. August 05, 2016, 60 percent opacity smoke incident.

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