

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

A074643199

FACILITY: Autocam/Pax		SRN / ID: A0746
LOCATION: 201 PERCY ST, DOWAGIAC		DISTRICT: Kalamazoo
CITY: DOWAGIAC		COUNTY: CASS
CONTACT: Cheryl Bennett , Administrative Assistant and Safety Coordinator		ACTIVITY DATE: 01/30/2018
STAFF: Amanda Chapel	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On January 30, 2018, AQD's Amanda Chapel and Dennis Dunlap (staff) conducted an unannounced inspection of Autocam/Pax now NN Autocam located in Dowagiac, Cass County. The purpose of this inspection was to determine compliance with all applicable state and federal air regulations. The following will summarize facility operations and compliance status.

We arrived at the facility at 12:45pm. There were no visible emissions or odors detectable from the road in front or behind the facility. We parked and entered the office area, located in Plant 3 of the facility. We stated that we were from the Department of Environmental Quality here to do an unannounced air quality inspection and we were buzzed into the waiting area. I asked for the person who was responsible for the environmental compliance and the woman at the desk, Ms. Cheryl Bennett stated that we her responsibility. I presented her with my inspection credentials and handed her a business card. I explained that during the last inspection, in 2010, the facility was operating entirely under exemptions. For the inspection, we would like a tour of the facility and then, if required, request records or SDS sheets be emailed to verify facility operations.

The last inspection of the facility was on October 26, 2010 and the facility was in compliance. At the time, the facility was operating under the Rule 285(2)(l)(vi)(B) exemption for carving, cutting, routing, turning, drilling etc. of metals released only to the in-plant environment, and Rules 282(2)(h) and (k) for cold cleaners and aqueous based parts washers. There are approximately 46 staff members that work 2 shifts per day. The day shift is from 6am-4:30pm and the night shift is from 7:30pm – 6am. The facility operates Monday through Friday and occasional weekends. There are no boilers or emergency generators on site. There are 3 cold cleaners or parts washers; one in Plant 3 and 2 in the maintenance area in Plant 1, though one is not in use. There are three Plants on the property but only Plants 1 and 3 have any production activity. Plant 2 has never been in use while Autocam has owned the property and it is used for storage and spare parts.

First, Ms. Bennett took us into Plant 3. In Plant 3, there is an automotive and non-automotive side. On the non-automotive side, there are 11 turning machines and 4 mill machines. Most of the machines in Plant 3 are enclosed individually. All of the machines are piped to smog hogs located on the ceiling of the plant. There are either multiple machines for one smog hog or one machine to one smog hog. The smog hogs are maintained monthly. There are vented internally. On the automotive side, there are 4 drills, 5 automated and 2 manual forge machines, 6 lamberts, and 5 turning machines. The forge machines appear to be exempt under Rule 285(2)(l)(i) for bending, forming, forging etc. hot or cold metals. The milling, turning, lathing, drilling, and cutting machines appear to be exempt under Rule 285(2)(l)(vi)(B) for the cutting, turning, drilling, grinding etc. of metal that is vented only to the in-plant environment as all the machines are vented to internal smog hogs.

These machines use either coolant or cutting oil to operate. Storage for these chemicals was observed. The different types of cutting oils, cleaners, and coolants observed are: Shell Tellus 46, Shell Tellus 32, Shell Tonna V68, Safety Kleen, Syntilo 9918, RustiLo DWx30 RPO, Garia 621CM-36, Renolin EP150, Shell Morlina BL10, Spindle Oil, Shell Tellus 52V15, and Macron 32. Which oil is used is dependent on the machine and what the job is.

We observed used rags being stored in a closed container. The aqueous parts washer is located behind the 5 automotive turning machines. The lid was open because the part was in use by the employee running the turning machines. It was indicated by the building manager that the lid is typically kept closed. He also demonstrated the soap and water coming out of the hose. This is exempt under Rule 282(2)(k). We also observed a scrap chip spinning unit. Scrap metal from the machines is dumped into the machine which then spins the oil from the parts. The used oil is collected and disposed of as waste. The

now oil-free scrap metal is deposited into a hopper and sent to Padnos for recycling.

We then walked to Plant 1 to observe operations there. Plant 1 operates in the same way as Plant 3 but they do have two heat treat process machines, one of which is out of service. There are 8 grinding machines which use water soluble coolant, 8 CNC turning lathes which also use water soluble coolant, 3 mechanical screw turning machines which use cutting oil, 14 gear hobbing machines which use cutting oil, and 2 heat treat process machines which use a water based quench. Only one of the heat treat machines is in use. The water based quench that is used is Quench AW. As above, the cutting, drilling, hobbing etc. machines appear to be exempt under Rule 285(2)(l)(vi)(B). The heat treat machines are exempt under Rule 285(2)(r)(i).

We observed a rust inhibitor can in use during the inspection. Each station was equipped with one. The part is coated in the rust inhibitor and then left to drain on the mesh of the open can. These emissions are released into the in plant environment. There is a 50/50 parts washer located in the maintenance area of Plant 1. It is filled 50% with Safety Kleen and 50% with Protech 1300, a rust inhibitor. The cold cleaner has an automated lid which was operated by a control panel. This simultaneously lifted the lid and raised a mesh platform where the tools would be placed. The lid was closed during the inspection. This appears to be exempt under Rule 282(2)(h) for cold cleaners with an air/vapor interface of less than 10 square feet. There was also a pre-heat treat wash only machine in the area. It was labeled that it only used Rustveto 4242. A Panshoff water based parts washer was located in the corner but it was unused.

We walked back to Plant 3 and Ms. Bennett let us into the building. Since it was evident that there were no records to review, I requested that Ms. Bennett email us the MSDS for the most commonly used cutting oil, Safety Kleen, RustVeto 4242, and Quench AW MSDS. These were received, via email, on January 31, 2018. We thanked Ms. Bennett for giving us a tour of the facility and left around 2:00 pm. The submitted MSDS sheets are attached to this report. It appears that the facility is continuing to operate under exemptions and is in compliance.

NAME

Aimee Chyle

DATE

2/1/18

SUPERVISOR

MA 2/1/2018