

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

A4906
FY2019 Insp-

A490646876

FACILITY: Ace Controls Inc		SRN / ID: A4906
LOCATION: 23435 Industrial Park, FARMINGTN HLS		DISTRICT: Southeast Michigan
CITY: FARMINGTN HLS		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 10/02/2018
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2019 inspection of Ace Controls, Inc. ("Ace" or "ACI")		
RESOLVED COMPLAINTS:		

Ace Controls, Inc. (A4906)
23435 Industrial Park Dr.
Farmington Hills, Michigan 48335-2855

Phone: 248-476-0213
www.acecontrols.com

PTI Exemption Rules: 336.1285 and 336.1287

N7945 (25238 Joy Blvd., Farmington Hills): is an incorrect SRN, which is in the databases for Ace Controls.

On October 02, 2018, I conducted a level-2 self-initiated **FY 2019 inspection** of Ace Controls, Inc. ("Ace" or "ACI") located at 23435 Industrial Park Dr., Farmington Hills, Michigan 48335-2855. 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. Vince Pultorak (Phone: 248-476-0213; Fax: 248-476-2470; E-mail: vPultorak@AceControls.com), Manufacturing Engineering Supervisor, assisted me.

Machines

Ace Controls manufactures deceleration technology products such as industrial shock absorbers, safety absorbers, velocity, motion, vibration and feed controllers. The products are made with 5% manufacturing and 95% assembling of parts supplied by outside vendors. 13 CNC machines for milling and turning are present. Parts are sent to the vendors for plating (Ni), heat-treating or black oxide coating. The deceleration units, which are nitrogen charged gas springs, are used in amusement parks, doors, tool boxes, etc. Ace does not supply its products to low profit margin automotive industry.

Of 13 CNC machines, 3 machines use reagent alcohol mist and rest (10) use either water or vegetable oil-based coolant to cool tools. Three (3) CNC machines of thirteen (13) that use alcohol mist are equipped with one common Air Quality Engineering cartridge filters to improve in-door air quality. About 80 gallons per year reagent alcohol is used in these machines. Filtered exhaust air is released to in-plant environment. Most alcohol evaporates into the in-plant environment before exhaust reaches the filters, which obviously do not remove reagent vapors. One CNC machine is equipped with oil mist filter. The filters are replaced biannually.

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(I).

Turbo Spray Booth (80% TE) – Idled since May 2017

As proposed in the March 16, 2010, letter one Turbo Spray (Midwest, Inc., Howell, Michigan) coating booth is installed. The booth, which is not a traditional booth but a coating machine, is equipped with four guns and downdraft filters for overspray paint particles control. The coating operation achieves 80% or higher transfer efficiency (TE) depending upon shape and dimensions of the part being coated. Such high transfer efficiency is achievable because of only fixed dimensions (cylinders: L = 600 mm and D = 28 mm) of the parts that are coated. PPG WPM-901 / LG black water-based paint containing less than 5% VOC is used. About 25 gallons of

paints per year were used in CY 2016. The usage has reduced to zero gallons per year as the booth has been idled since May 2017.

Turbo spray booth is smart spray booth. The sensors detect dimensions of the part being coated to achieve high transfer efficiency. The spray pattern and the guns are designed and adjusted using sensors for the fixed dimension cylindrical parts such that overspray is controlled to the maximum extent possible considering the requirement to paint all cylindrical surfaces with consistent quality.

Upon filtration via paper filters, the exhaust is discharged to outside ambient air via one stack. The filters are replaced once per month when in use.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(c).

No organic (VOC / HAP) solvent cleaning is done. Only aqueous cleaners are used. Eight 100-gallon tanks (RAMCO or Magnus) that use water based cleaner (hot water) are present. Since 95% of production work is assembly, there is relatively large assembly area. One testing laboratory is present. The parts assembled are tested for the required performance.

About 2 gallons of acetone per year is used for cleaning via acetone-moistened rags.

Conclusion

N7945 is incorrect SRN for this facility. Rule 287(2)(c), 80% TE coating booth. All process equipment, as stated above, satisfy PTI exemption conditions: Rules 285 and 287.

NAME S. Sumanahall - DATE 11/07/2018 SUPERVISOR Joyce St