

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

FY2015 Insp-

B870929731

FACILITY: Form Tech Industries, LLC.	SRN / ID: B8709
LOCATION: 2727 W FOURTEEN MILE RD, ROYAL OAK	DISTRICT: Southeast Michigan
CITY: ROYAL OAK	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 06/03/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of Form Tech Industries, LLC. ("Form Tech"), wholly owned by HHI Holdings, LLC	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

B 8709 - SAR - 2015 06 03

Form Tech Industries, LLC. (B8709)

Owned by HHI Holdings, LLC
fka Forming Technology, Inc.
2727 West 14 Mile Road
Royal Oak, MI 48073-1712

Name Change: Forming Technology, Inc. (about 2000) → Form Tech Industries, LLC.

PTI No. 486-89 dated August 23, 1989

Rules 281 and 285

Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations.

On June 03, 2015, I conducted a level 2 self-initiated inspection of Form Tech Industries, LLC. ("Form Tech"), wholly owned by HHI Holdings, LLC, located at 2727 West 14 Mile Road, Royal Oak, Michigan 48073-1712. 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, Ms. Linda Jarbo (Phone: 248-577-8986; Fax: 248-549-4823; Cell: 248-933-3933; E-mail: LJarbo@HHIHoldings.net), Director of Human Resources, Mr. Dale Ochs (Phone: NA; Fax: 248-549-4908; Cell: 313-215-8986; E-mail: DOchs@HHIHoldings.net), Maintenance Supervisor, and Mr. Terry Cornell (Phone: 248-597-3887; Fax: 248-597-3855; Cell: 586-246-9412; E-mail: TerryCornell@formtech2.com), Plant Manager, assisted me.

Mr. Perry Williams (Ph: 248-597-3809; Fax: 248-597-7553; Cell: 313-779-1295; E-mail: perrywilliams@formtech2.com), Corporate Human Resources Manager, separated about March 31, 2015. Ms. Linda Jarbo replaced him.

MPG (NYS: MPG, Metaldyne Performance Group) owns HHI Holdings, Metaldyne and Gredy Foundries. MPG went public about December 2014.

Form Tech is owned by HHI Holdings, Inc., a Hedge Fund Investor Holdings Company. Form Tech makes transmission parts for automotive industry; all OEMs. Neither heat-treating nor coating process is present. Water-based cleaners are used. Solvents for degreasing are used.

In addition to Form Tech Royal Oak, Form Tech operates other facilities in Fraser, Troy, Michigan (Shutdown: Detroit, Michigan; Canal Fulton, Minerva, Ohio. Sold: Fort Wayne, Indiana, to American Axle).

Form Tech's bankruptcy was resolved in 2009. HHI bought Form Tech in bankruptcy.

PTI No. 486-89 Wheelbrator shot-blast machines

Four permitted Wheelbrator shotblasting / sandblasting machines are present. In addition to four permitted machines, about 2013 one small machine was installed using Rule 285 exemption. In all, there are five machines. Each machine is equipped with one dedicated Torrit Cartridge Filter (2500 cfm each) for metallic dust control. Six filter cartridges with pulse-jet air cleaning are present. Air pulse frequency for cleaning is based upon pressure differential (ΔP). Magneheilic device measures ΔP . Six hoppers in all for six filter systems are present; one hopper for each filter system. The hoppers are emptied once per day. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I).

Donaldson cartridge filters are replacing original Wheelbrator cartridge filters. Metallic S-330 steel shot is used for sandblasting. Exhaust gases from the machines, upon filtration using cartridge filter systems, are discharged to outside ambient air.

The PTI No. 486-89 limits are: 0.01 lbs. PM / 1000 lbs. exhaust (PTI No. 486-89, SC 10), no VE (PTI No. 486-89, SC 11), install and operate cartridge filters properly (PTI No. 486-89, SC 11), etc. Form Tech complies with these permit conditions using cartridge filter systems.

Hot and cold forging

8 Hatebur hot forging (of 8, 1 is in storage), and 6 cold forging (of 6, 3 are in storage) machines are present. Into hot forging (6 70-amp, 1 30-amp & 1 50-amp) machines, steel rods are fed and the rods are heated by induction heat (electric) to 1600-2200 °F. Heated bars are cut to desired size. The parts are beaten to achieve desired form. Water based coolant is used to cool the parts upon forming. The parts are checked for dimensions and defects at Cabi Nos. 1 & 2.

One additional Kurimoto C2F-30 machine (vertical forge) performs same tasks as Hatebur machine (horizontal forge). Kurimoto machines is equipped with an air filtration device.

Water spray is used to cool and protect the tools.

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

Tool room

11 CNC lathes and 5 CNC mills make tools. 3 grinders, 2 hones and 2 manual lathes are also present. Each machine is equipped with a Mistbuster Filter for mist control. All exhaust gases are released in-plant.

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

2 cold-cleaners.

One 3'x5' Safety-Kleen (2005) tank-type and one 3'x4' sink-on-a-drum type Crystal Clean (2009) parts- / cold-cleaners with spray brush are present. The cold-cleaners are subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

No halogenated solvent is used. Hence, the cold-cleaners are not subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T)

The lids are either electrically / power (Safety-Kleen) or mechanically (Crystal Clean) assisted. The tank-type (Safety-Kleen) cold-cleaner is electrically operated: simultaneously lid is closed and parts are immersed in the solvent with an operation of a switch. Both cold-cleaners are serviced by Safety-Kleen. Solvent is replaced once about two months. I gave on June 28, 2011, work-practice decals for posting. Decals were posted during the FY 2015 inspection.

Exxon-Mobil Chemical Co. (281-870-6000) supplies the degreasing solvent: Mineral Spirits known as Synthetic Isoparaffin Hydrocarbons. Solvent distributor is by PVS Nolwood Chemicals, Inc. (313-925-0300) of Detroit.

Flash Point (FP) = 120 °F TCC ASTM D56 closed cup. Specific gravity (SG) = 0.76. Density (ρ) = 6.33 pounds / gallon at 60 °F. Flammability range = 0.7%v (LEL) & 5.5%v at 77 °F (UEL). Auto Ignition = 689 °F. Vapor Pressure (VP) = 0.78 mm Hg @ 68 °F. Boiling Point (BP) = 354-369 °F. Viscosity (μ) = 1.8-77 centistokes.

Conclusion:

Sandblasting particulates and cold-cleaners.

NAME J. J. Kavanahall DATE 06/10/2015 SUPERVISOR CJE