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

N252832350

FACILITY: KAMAX L. P.		**SRN / ID:** N2528
LOCATION: 500 W Long Lake Rd, TROY		**DISTRICT:** Southeast Michigan
CITY: TROY		**COUNTY:** OAKLAND
CONTACT: Ron Harsch , EHS Mgr		**ACTIVITY DATE:** 11/05/2015
STAFF: Samuel Liveson	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Scheduled inspection of a minor source.		
RESOLVED COMPLAINTS:		

On November 5, 2015, staff of the Air Quality Division (MDEQ-AQD) conducted an unannounced, scheduled, level 2 inspection of KAMAX L.P. (KAMAX), located at 500 W Long Lake Road in Troy, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of Permit to Install (PTI) No. 194-90.

I arrived on site around 10:00 AM. I met with Mr. Ronald L. Harsch, Corporation Safety, Environment, & Facility Manager. Mr. Harsch provided records and a site walkthrough. I provided Mr. Harsch with my contact information and a copy of the pamphlet "DEQ Environmental Inspections: Rights and Responsibilities."

Opening Meeting

KAMAX qualifies and packages bolts used primarily in the automotive industry. Actual bolt manufacturing occurs at a separate KAMAX facility in Lapeer, Michigan. Since the last inspection at this facility, KAMAX has installed and operated one surface coating line to apply a coating layer to bolts. This coating layer acts as a locking mechanism to prevent bolts from coming loose. PTI No. 194-90 covers a water evaporating unit at the facility.

The company has approximately 115 full-time employees and 35 part-time employees at its Troy office. The facility operates three shifts Monday through Friday, with additional work occurring on Saturdays.

Facility Walk-Through

Bolts received from the KAMAX manufacturing location in Lapeer undergo inspections for quality assurance at the Troy location. Quality assurance inspections take place at about fifteen inspection machines on site. These inspection machines consist of large funnels where bolts are loaded, and gears and belts to move bolts for manual inspection. There do not appear to be air emissions associated with these inspection machines.

A 430 gallon parts washer on site is used to remove oil and grease from bolts. The parts washer uses Metkote Q7, a water-based washing fluid. The Metkote Q7 MSDS is available in the facility manila file. The parts washer does not emit to ambient air. This equipment appears to be exempt from obtaining a Permit to Install per R 285(r)(iv). After being washed, parts travel through a natural gas dryer operated at 200 °F. The heater appears to be exempt from obtaining a Permit to Install per R 282(b)(i).

If requested by the client, bolts are dipped into a small tank containing a rust inhibitor. The emissions from the rust inhibitor are vented to the in-plant environment. Mr. Harsch provided the MSDS for the most-commonly used rust inhibitor, Metkool 711PX. This process appears to be exempt from obtaining a Permit to Install per R 285(r)(i).

Samsco Water Evaporator

PTI No. 194-90 covers a water evaporator located at the facility. Mr. Harsch explained that the water evaporator is currently disconnected. It is a 400 gallon tank that boils fluid to evaporate water. It is currently only used as a container when transferring parts-washer water and floor scrubber water from a 1000 gallon above-ground storage tank to a 3000 gallon underground storage tank. This spent water is instead disposed by Usher Oil Company, as shown in a manifest of disposal provided by Mr. Harsch.

Cold Cleaner

The facility has one cold cleaner on site. Operating instructions were posted, and the unit was closed during the inspection. Its surface area appeared to be less than 10 square feet. The unit appears to be exempt from Permit to Install requirements per R 281(h). 100% toluene is used as the solvent inside the cold cleaner.

Surface Coating Line

Since the previous inspection, the facility has installed one surface coating line that began operation in July of 2014. Bolts roll over a mechanism that applies a strip of locking coating to the bolt. When a bolt is tightened, this coating layer locks the bolt into place so that it does not become loose over time. Afterwards, parts travel through a natural gas heater kept at 80°C. The facility operates the line under the Permit to Install exemption R 287(c).

The facility provided detailed coating usage records from the beginning of operation through present day (November 5th). The most coating used in a day has been 4.8 gallons, and generally ranges between one and two gallons. Records appear to show the facility does not use more than 200 gallons per month.

The facility provided the MSDS of Precote 85, the primary coating used on the line. The coating contains up to 50% toluene, a hazardous air pollutant (HAP). According to Mr. Harsch, Precote 85 has the highest content of toluene of coatings at the facility.

A potential to emit calculation considering a legally enforceable limit of 200 gallons of coating a month, and including emissions from the cold cleaner, appears to conclude that the potential to emit toluene from the facility is less than 10 tons per year. On December 2, I left a voicemail for Mr. Harsch explaining that the facility should apply for a HAP opt-out permit before installing another similar surface coating line or any cold cleaners. Otherwise they may be considered a major source for toluene and be excluded from exemptions by R 278(2). On December 8th, Mr. Harsch explained the facility does not plan to install another surface coating line at this time.

Emergency Generator

A small natural-gas emergency generator is located on-site to apply power to the computer room in the case of a power outage. The generator was installed in 2002 according to Oscar & Larson, the equipment contractor. I explained that the engine may be subject to 40 CFR

Part 63 Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. However MDEQ-AQD has not accepted delegation to enforce this standard at area sources. Mr. Harsch explained that the engine is maintained by Oscar & Larson.

Compliance

Based on the AQD inspection and records review, it appears that KAMAX is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

NAME _____ DATE 12/5/15 SUPERVISOR CJE