

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N296155140

FACILITY: ANDERSEN & ASSOCIATES		SRN / ID: N2961
LOCATION: 30575 ANDERSON COURT, WIXOM		DISTRICT: Warren
CITY: WIXOM		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 09/11/2020
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2020 inspection of Andersen & Associates, Inc., ("Andersen"), dba Andersen Material Handling("AMH")		
RESOLVED COMPLAINTS:		

**Andersen & Associates (N2961; U-63-09-0604 was also used)
dba Andersen Material Handling
30575 Andersen Court (formerly, 30575 Beck Road)
Wixom, Michigan 48393-2817**

Phone: 248-960-6800 for Anderson & Associates

Void: PTI# 677-91 (N2961) dated August 29, 1991, for Flexo Printing Process (Pur-pak aka Elopak) was voided on December 13, 1993.

Rules 281,285 and 287

N2961 SRN reassign (Apr 2013): Pur-Pak, Inc. (aka Elopak, Inc at New Hudson under SRN N2712) → Andersen & Associates, Inc. dba Andersen Material Handling. SRN N2712 is reassigned to Henrob Corpoation about 2013 and Henrob obtained AQD permits.

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. Andersen does not use halogenated solvents (>5%w: methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5), and chloroform (CAS No. 67-66-3)); it uses Safety-Kleen mineral spirits (Stodard solvent or petroleum naphtha) degreasing solvents.

On September 11, 2020, I conducted a level-2 self-initiated **FY 2020 inspection** of Andersen & Associates, Inc., ("Andersen"), dba Andersen Material Handling("AMH"), located at 30575 Andersen Court (formerly, 30575 Beck Road; City of Wixom renamed this address as 30575 Andersen Court), Wixom, Michigan 48393-2817. 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 Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. David Streefkerk (Phone: 248-960-6800-ext. 6828; Cell: 248-521-0465; E-mail: dStreefkerk@AndersenMH.com), VP, Renewed and Rental, Andersen Assoc., via phone, and Mr. Jeremy Truran (Phone: 248-668-2604; Cell: 248-789-2973; E-mail: jTruran@AndersenMH.com), Operations Directions, assisted me.

Andersen Associates, which was established in 1960, conducts fork-lift or forklift truck (Raymond [mostly electric], Komat'su [mostly propane]) sales, services, repairs, maintenance leasing business. Besides, Andersen provides to its customers material handling solutions. Andersen deals in both electric and propane trucks.

Due to COVID-19 pandemic, Andersen's business picked up as some warehouse activities especially related to food and grocery increased.

One 287(2)(c) Paint Spray Booth (15 ft. W* 15 ft. D * 20 ft. H)

One paint spray booth (15 ft. W* 15 ft. D * 20 ft. H; open at the front) to paint fork-lifts for repairs and maintenance is present. The booth is equipped with a back-draft filter system consisting 40 filter panels for paint overspray particulate control. The filters are located at two back corners. I asked Mr. Truran to install the filters snug and tight such that there were no holes and gaps, which I found during the FY 2017 inspection. Mr. Truran promised to reinstall the filters, correctly. Although coating usage records were not kept, I am convinced that the usage is substantially less than 200 gallons per month. Based upon production volume, Mr. Truran estimated about 5-10 (<< 200) gallons of coatings per month usage. Coatings are always red and black. All coatings are water based. Primer, clearcoat (CC) coatings are not used; i.e., only basecoat (BC) coatings.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(2)(c).

Upon keeping usage records such as current contemporaneous daily usage logs in fluid ounces (5-10 << 200 gallons of coatings per month, 1 US fluid ounce = 1 US gallon), the coating booth meets all the Rule 336.1287(2)(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

Andersen started keeping the coating usage logs logs after the previous inspection results and my recommendations. As stated above the coatings are water-based and the logs include water. I asked . Mr. Truran to use a separate log sheet per month for user-friendliness.

Three identical Safety-Kleen Parts Cleaners

There is one identical (reduced from 5 [2009] to 3 [2013]) then to 1 [2020]) Safety-Kleen cold-cleaners (4 ft. * 2 ft.). The units were installed about 2010 (after 1979). Each cold-cleaner is subject Rule 336.1707 (new) depending on if it is existing or new; the cold-cleaner is new because it was installed after 1979. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(2)(h) or Rule 285(2)(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. As the cold-cleaners were installed after 1979 (2010), they are considered new cold-cleaners. I gave, on November 5, 2009, Mr. Truran a copy of DEQ's "cold-cleaner operating procedures" and asked him to follow the decal's common-sense work practice procedures.

"Sink on vat" cold-cleaner (Safety Kleen Model No. 44.1 Solvent VAT Parts Cleaner) is equipped with mechanically assisted lid. Truran would train employees regarding proper work-practice.

Mechanically assisted lid was closed. Operating procedures were posted. Safety-Kleen services the units.

Safety-Kleen solvent (Product Code: 6605 or 6616) is used for degreasing. The solvent is petroleum naphtha consisting of 100% hydrocarbons derived from petroleum distillation. Safety-Kleen services the parts cleaners. Every 12 weeks new solvent is delivered and dirty solvent is recycled by Safety-Kleen at its solvent recovery facility.

100% VOC. Flash Point (FP) = 148 °F (Tag Closed Cup). LEL = 0.5-0.8 %. UEL = 5-6%. BP = 300-350 °F. Ried Vapor Pressure (VP) = 0.1 psia at 100 °F. Specific gravity (SG) = 0.77-0.80. VOC = 100%. Density (ρ) = 6.4-6.7 pounds of VOC per gallon (770-800 g/L = 0.770-0.800 kg/L) of solvent.

5-gallon solvent still

5-gallon distillation still (Safety Kleen NASCAR Performance Model No. 701300) is present. At night, contaminated solvent is placed in 5-gallon container using a plastic bag. Contaminated solvent is heated to 104 °F at night and solvent vapors generated from dirty solvent by supplying enthalpy (latent heat) of evaporation are condensed using a condenser. Condensed pure solvent is collected in 5-gallon container. Thus condensed pure solvent is reused in the degreasing HVLP guns. Practically dry sludge remaining in the bag upon overnight evaporation of solvents is disposed of as non-hazardous RCRA solid waste. Sludge containing bags are stored in a closed container until disposed of. Hence, hazardous solid waste is converted to non-hazardous solid waste and, as an added bonus, solvent is recovered and reused. Safety Clean services this equipment as well.

One 5-gallon water tank is present to provide cooling water to the condenser.

The 5-gallon distillation still (<< 55 gallons) is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(u).

RCRA / Hazardous Waste

