

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

FY 2016

N297833908

FACILITY: Scodeller Construction		SRN / ID: N2978
LOCATION: 51722 GRAND RIVER, WIXOM		DISTRICT: Southeast Michigan
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Eamonn Dwyer, Manager		ACTIVITY DATE: 03/01/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2016 inspection of Scodeller Construction		
RESOLVED COMPLAINTS:		

N2978 - SAR - 2016 03 01

Scodeller Construction (N2978)
51722 Grand River
Wixom, Michigan 48393-2303

Void: PTI No. 441-91 (S & R Equipment Co., Inc. N2978) for paint spray booth – voided on 7/7/2010 based upon FY 2010 inspection.

SRN reassign (2010): S & R Equipment Co., Inc. (N2978) → Scodeller Construction (N2978)

VN: AQD issued July 6, 2010, Violation Notice (Rules 707 & 910 – cold-cleaner).

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. Scodeller Construction uses only halogen-free Stoddard / Mineral Spirits solvents for degreasing.

On March 01, 2016, I conducted a level-2 self-initiated inspection of Scodeller Construction (“Scodeller”) located at 51722 Grand River, Wixom, Michigan 48393-2303. 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; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

S & R Equipment Co., Inc. moved out of this building before 2005; the company may be out of business. The current occupant is Scodeller Construction, which moved into this building about 2005 according to Mr. Eamonn Dwyer. Scodeller and S & R have nothing to do with each other.

During the inspection, Mr. Eamonn Dwyer (Ph: 248-374-1102-ext. 108; Fax: 248-374-1109; Cell: 248-787-1139; E-mail: EamonnD@scodellerconstruction.com), Manager, Scodeller, was out of town. Mr. Ron Crusan (Phone: 248-374-1102), Mechanic, assisted me.

Scodeller is in the business of sealing joints and cracks in roads, airports and bridges, etc. This is nation-wide road business including Florida. At this location in Wixom, only office and vehicle maintenance activities take place. About 80 big construction trucks are maintained at this site.

4*2' parts / cold cleaner

The maintenance garage has one (4 ft. *2 ft.) parts / cold-cleaner (R & D Fountain Industries Co.). It is “sink-on-drum” (40-gallon drum as reservoir to hold solvents) type with spray and mechanically-assisted lid. No halogenated solvent is used. Mineral spirits is used as cleaning solvent. Each cold-cleaner is 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.

Mechanically assisted lid was closed during FY 2016 inspection and the work-practice procedures were posted

although soiled. The cold-cleaner is sink-on-drum type (40-gallon).

The Cold-cleaners are NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

I gave on March 1, 2013, decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice in the procedures. Also, the decals were also sent along with 2010 Violation Notice. Again, on March 1, 2016, I gave the decals to replace the soiled decals.

Regular Mineral Spirits (CAS 64742-82-1) parts cleaner solvent – Medium Aliphatic Naphtha – Petroleum Distillate (Webb Chemical Service Corp. of Muskegon Heights, MI Phone: 231-733-2181)

100% VOC solvent. Flash Point (FP) = 108 °F TCC. Auto Ignition = 530 °F. Boiling Point (BP) = 315 – 425 °F @ 760 mm Hg. Vapor Pressure (VP) = 0.2 mm Hg at 68 °F. Specific Gravity (SG, Water = 1.0) = 0.793. Density (ρ) @ 68 °F = 6.61 pounds / gallon (0.793 kg /L). Flammability range = 1 %v (LEL) – 6%v (UEL).

Scodeller does not use Corrigan solvent anymore: Corrigan 142 Solvent (CAS 64742-42-8) parts cleaner solvent – Hydro-treated Light Parafinin Naphtha – Petroleum Distillate

July 6, 2010, Violation Notice

During the June 9, 2010, inspection, the lid was open and solvent was pumped continuously and splashed with lid being open or uncovered resulting in high VOC volatilization. The operator access to the cleaning tank was not required during solvent splashing. As a matter of fact, solvent was splashed when the equipment was idle and the lid was open or uncovered. It appeared that splashing degreasing solvents was common work practice. AQD issued July 6, 2010, Violation Notice for Rule 336.1707(3) for splashing solvents with lid open at all times and Rule 336.1910. AQD received a VN response letter dated July 16, 2010, that stated that the operating procedures would be posted and the employees would be trained of the work-practice procedures for the cold-cleaner.

Conclusion

PTI No. 441-91 (S & R Equipment Co., Inc. [N2978]) is voided on July 7, 2010. Scodeller is compliance with Rule 336.1707. July 2010 VN is resolved.

FYI: VN dated July 6, 2010

NAME Blennanahall DATE 03/25/2016 SUPERVISOR CJE