

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

N497237405

FACILITY: ACAL Precision Products		SRN / ID: N4972
LOCATION: 20200 CORNILLE DR, ROSEVILLE		DISTRICT: Southeast Michigan
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Joseph Elsesser , President		ACTIVITY DATE: 10/19/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	
SUBJECT: Evaluation of permit No. 447-92 and Federal Clean Air Act Part 55		SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:		

Background

ACAL Precision Products (ACAL) SRN: N4972 is a machining and grinding facility located at 20200 Cornille Drive, Roseville Michigan. ACAL is located in a primarily light industrial/residential area with the nearest residential structure approximately 150 feet south of the facility. The facility was inspected on Wednesday 10/19/2016 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the 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 of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. ACAL currently holds permit No. 447-92 for grinding processes with four smog hog collectors. The site contact is the machinist, George Hilliand. ACAL specifically machines parts for the automotive, military and aeronautical industries. ACAL has approximately 11 employees and operates 8-10 hours a day starting at 6am, on Monday- Friday with the occasional Saturday.

Inspection

Site arrival was at 3:37 pm, Wednesday 10/19/2016. I was greeted by George Hilliand. Upon meeting I presented my State of Michigan identification card, informed the facility representative of the intent of my inspection and was permitted onto the site. George informed me that the facility has 11 employees. I gave him a DEQ Environmental Assistance Center pamphlet and told him that if they have any questions about permits and regulations that the EAC is designated to assist small businesses with environmental compliance. George gave me a tour of the facility and showed me what equipment the facility has and what was connected to the permitted smog hogs. At the time of the inspection I counted the following equipment:

Equipment	Number of equipment	Notes	Controlled by smog hog
Grinders	15	One was disabled	Y
CNC	16	One not working. The equipment was enclosed	N
Cut off saw	1		Y
Lathe	3		Y
Band saw	1		Y
Sand blaster (small)	1	Not vented outdoors. Controlled by a small fabric filter	N
Air Compressor	2		N
Parts Washer	1	Warm water and detergent based. ***Manufacturers recommendation is to not use any solvent based compounds in this machine.	N

When inspecting the equipment and the associated smog hogs, I observed that they did not vent to the outside air. When asked about this, George stated that as far as he was aware they had always been vented inside. The metal cutting and grinding appears to be exempt per Rule R 336.1285(l) which states in part that a process is exempt from Rule R 336.1201(1) if the following conditions are met.

...(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding,

sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following: ...

... (B) Equipment has emissions that are released only into the general in-plant environment.

I informed George that the equipment appeared to meet the permit exempt, and if the facility would like, they could most likely be able to void their permits and use the permit exemption instead. ACAL's parts cleaner uses an aqueous solution and does not use halogenated solvents. It appears that the parts cleaner is not subject to 40 CFR Subpart T—National Emission Standards for Halogenated Solvent Cleaning. This equipment appears to meet permit exemption R 336.1285(I) which in part states:

The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:...

...(I)The following equipment and any exhaust system or collector exclusively serving the equipment: ...

...(iii) Equipment for surface preparation of metals by use of aqueous solutions, except for acid solutions.

Significant Permit Conditions

General Condition 2- Rule 201 in part states that the applicant shall not reconstruct, alter, modify, expand or relocate the equipment unless plans are submitted and an application for a permit to install is submitted to the AQD. George informed me that they had not replaced the units and that the only changes had been regular maintenance. The maintenance is scheduled approximately every six months. I was unable to confirm the serial numbers on the equipment. The labels could not be read from the ground and the equipment was connected to the roof.

General Condition 3- Rule 901 states in part that the operation of the equipment shall not cause unreasonable interference with the comfortable enjoyment of life and property. The MDEQ AQD does not have a recent record of complaints against the facility.

Special Condition 11- Rule 331 states in part that the facility shall not exceed 0.01 pounds per 1,000 pounds of exhaust gases. The facility does not vent to the outside air and would not have exhaust gases. It is likely that the emissions from the facility will meet the permit limits.

Special Condition 12- This condition states that the particulate emission rate from the process shall not exceed 0.68 pounds per hour nor 3.0 tons per year. The facility does not emit to the outside air, therefore it appears the facility will likely meet the permit limits.

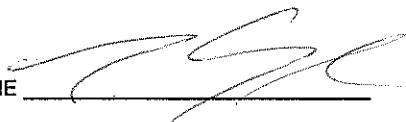
Special Condition 13- The facility is not allowed to generate visible emissions from the process. The equipment was being operated during my inspection. I did not observe any visible emissions coming from the equipment.

Special Condition 14- This requirement states that the facility shall not operate the grinding process unless the smog hog collectors are installed and operated properly. Three of the smog hogs were running when I first arrived. The northwest smog hog was not running because the equipment that it served was not being used.

Conclusion

It appears that ACAL is in compliance with permit No. 447-92 as well as the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. The facility appears to be able to use permit exemptions and void their permit, though they did not express a desire to do so.

NAME



DATE

11/9/16

SUPERVISOR

