

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

N726335544

FACILITY: Formtech Industries LLC Fraser		SRN / ID: N7263
LOCATION: 18450 15 MILE ROAD, FRASER		DISTRICT: Southeast Michigan
CITY: FRASER		COUNTY: MACOMB
CONTACT: Ron Parrish , Operations Manager		ACTIVITY DATE: 07/13/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Determining adherence to VN response.		
RESOLVED COMPLAINTS:		

Background

Formtech Industries LLC of Fraser (Formtech) SRN: N7263 is an automotive cold steel forging and machining facility located at 18450 15 Mile, Fraser, MI. The manufacturing facility was inspected on Wednesday 7/13/16 by Tyler Salamasick of the Michigan Department of Environmental Quality, Air Quality Division (AQD). The intent of the inspecting was to determine 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 Rule. The AQD also assessed the corrective actions Formtech took in response to the violation notice (VN) sent on May 5th, 2016. Formtech does not currently hold any air permits, however they do have a permit exempt baghouse for steel shot blasting operations.

On site I met with the operations manager, Ron Parrish the plant manager, Brian Cicillian and the maintenance manager, Jim Elandt. All three joined me in the inspection.

Inspection

Site arrival was at 9:05am Wednesday morning. The weather conditions were 81F with a SW wind at 6 mph and scattered clouds (weatherunderground.com). Formtech is located in a primarily light industrial/commercial area with the nearest residential structure approximately 0.1 miles North from the facility. I was greeted by Ron Parrish and Brian Cicillian. They called Jim Elandt to have him join us on the inspection. Upon meeting I informed Ron of the intent of the inspection and Ron granted me permission to the facility. We walked outside to the bag house affiliated with the Coining Cell Manufacturing Line to inspect the enclosure as well as the waste disposal drums. We then went into the production area to inspect the pressure drop as well as the screw conveyor (mechanical precleaner) attached to the pollution control device. Ron and Jim showed me how the operators perform their inspection and maintenance reporting on the electronic database referred to as Plexus Work System. The conditions of the violation notice and how Formtech resolves the conditions are as follows.

Conditions

Formtech must demonstrate the applicability of Rule 285(l)(vi)(c). Formtech appears to be able to meet this condition because they were able to show the AQD that they have a mechanical precleaner which is referred to as "screw conveyor". They also provided records of inspections and maintenance of the bag house while it operated with the recommended pressure drop. The equipment was visually inspected and appears to match the diagrams Formtech provided. Formtech also provided records of the pressure drop gauge installation by Ingersoll Mechanical. The AQD was also able to visually confirm that the equipment did have the Dwyer pressure drop as reported by Formtech. Jim informed me that the machine runs between the range of 0 and 1 inches of water. I was also informed that if the equipment goes out of that range an alarm will go off. This satisfies the AQD's request to determine the applicability of the permit exemption 285(l)(vi)(c).

Formtech was required to come up with a corrective action plan. The facility was able to demonstrate this requirement with both records of maintenance on the bag house as well as photos of the site cleanup. During my inspection the site was relatively clean with one small metallic powder spill (in the photograph). Ron informed me that they use sealed barrels to remove the waste from the bag house which are ultimately removed by Disposal Management. The photograph of the barrels shows the empty containers before they are filled. Ron also informed me that they most likely going to put the bag house inside of the building. Putting the bag house inside would also be a satisfactory method of reducing the potential for spillage of

materials. These handling practices if performed properly satisfy the VN requirement of properly removing the barrels.

The violation notice also requires Formtech to provide the AQD with a preventative maintenance plan. The construction of the enclosure in combination with the site cleanup and scheduled inspection/ maintenance satisfies the AQD's requirement. These actions should prevent residual metal particles in the soil or on the paved surface from leaving the site and affecting neighboring property. The scheduled inspection of the bag house along with regular bag changes should prevent malfunction of the pollution control equipment. The Dwyer pressure gauge in combination with the alert system also satisfies the preventative maintenance plan.

Conclusion

Base on the inspection of Formtech Industries LLC of Fraser, the Coining Cell Manufacturing Line appears to be compliant with permit exemption R 336.1285(l)(vi)(c). Formtech's response meets the requirements of the violation notice. It is recommended that the violation notice is resolved.

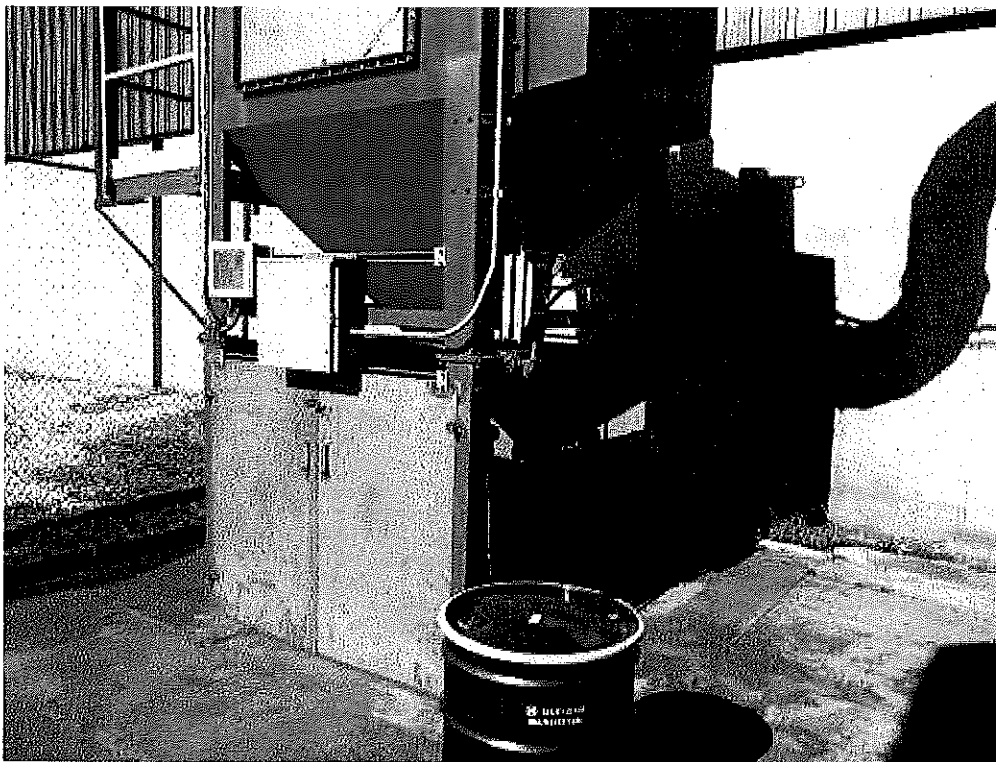


Image 1(Cover) : Recently installed barrier to prevent particulate material from escaping the collection area.

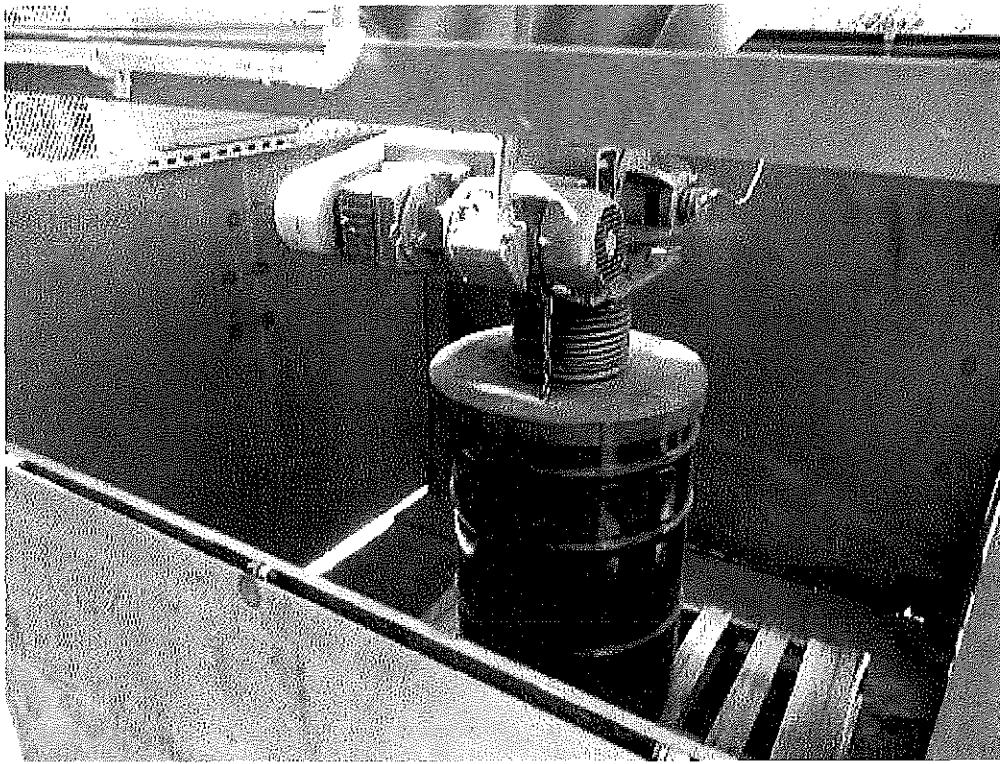


Image 2(Interior View) : View of the base of the bag house showing the enclosure.



Image 3(Ground Cover) : Area of clean up.



Image 4(Waste containers) : These currently empty drums are used to collect the magnesium and iron particles. They are sealed and removed once filled.



Image 5(Dwyer Pressure drop) : Photohelic pressure drop gauge used to monitor bag house pressure

differential.

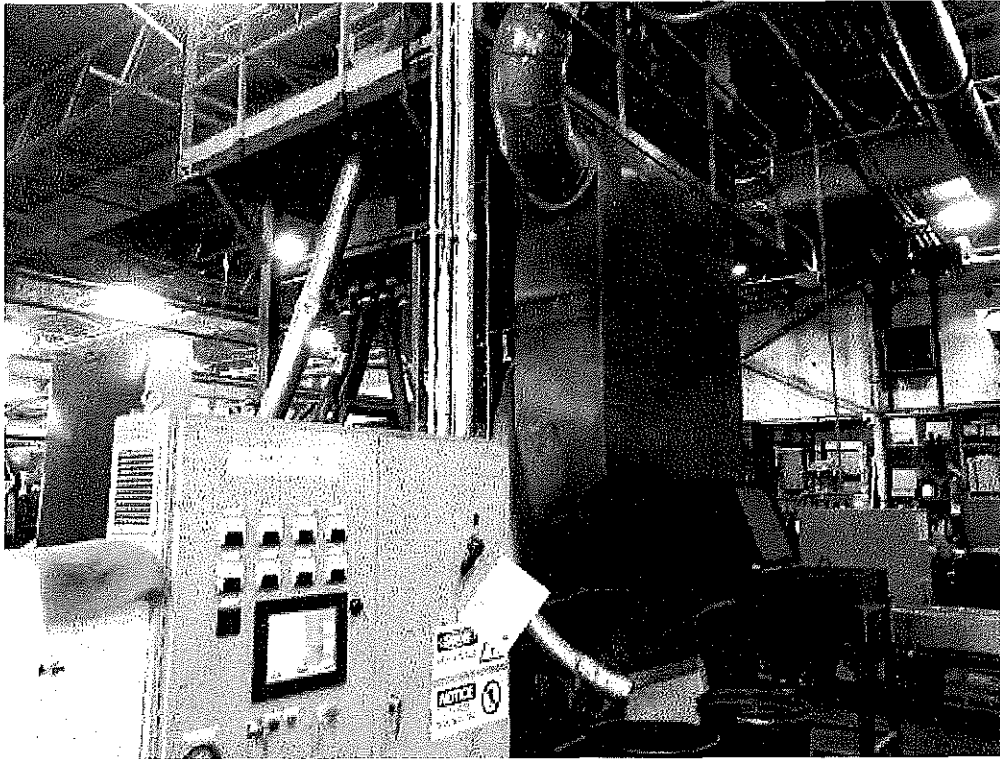


Image 6(Precleaner) : Mechanical precleaner and general work area.

NAME LSH

DATE 7/15/16

SUPERVISOR CJE