

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

FY 2014 Insp-

P018824501

FACILITY: Detroit Pump & Mfg Co		SRN / ID: P0188
LOCATION: 450-D Fair St, Building D, FERNDALE		DISTRICT: Southeast Michigan
CITY: FERNDALE		COUNTY: OAKLAND
CONTACT: John Swantek, VP Sales		ACTIVITY DATE: 02/21/2014
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2014 self-initiated inspection of Detroit Pump & Mfg. Company		
RESOLVED COMPLAINTS:		

Efile: P0188 - SAR - 2014 02 21

Detroit Pump & Mfg. Company (P0188)
450-D Fair Street, Building D
Ferndale, Michigan 48220

On February 21, 2014, I conducted a level 2 self-initiated inspection of Detroit Pump & Mfg. Company ("Detroit Pump"), an industrial scale pump systems company, located at 450-D Fair Street, Building D, Ferndale, Michigan 48220. 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 of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the FY2014 inspection, Mr. Scott Patterson (Ph: 248-336-5210 [direct] or 248-544-4242 [main]; Fax: 248-544-4141; Cell: NA; E-mail: scott.patterson@detroitpump.com), President, assisted me.

Mr. John Swantek (Ph: 248-336-5263 [direct] or 248-544-4242 [main]; Fax: 248-544-4141; Cell: 586-942-9480; E-mail: john.swantek@detroitpump.com), VP Sales, did not participate, and Mr. Mat Macey, Shop Manager, was on vacation.

Detroit Pump repairs and sells pumps. It also fabricates pump systems. The pumps are used in all process industries such as paint shops, waste water, chemical processes, etc.

About eight years ago (2006), Detroit Pump moved to Ferndale from Highland Park, Michigan. Fair Industries, Inc. (U-63-10-0660) occupied the entire building; now Detroit Pump occupies only part D. Fair Industries has gone out business.

Soon, Detroit Pump is going to move out of this building to make room for a Rail Road yard.

10 ft. * 10 ft. paint spray booth

The booth is exempt from Rule 336.1201 pursuant to Rule 336.1287(c) provided all the requirements of exemption are met:

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.

The booth is equipped with back-flow dry filter system. During the FY 2014 inspection, all four (4) filters were installed properly. I asked Mr. Patterson to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. I also asked him to keep records of paint and solvent usage according to Rule 336.287 (c). Both HVLP guns and spray cans are used.

Detroit Pump uses approximately 2-10 gallons of paint per month. The paints are both solvent (5%) and water (95%) based. Three colors are used: blue, yellow and occasionally black. While University of Michigan (Wolverines) requires blue paints, Michigan State University (Spartans) requires green paint.

The filters were removed during the FY 2011 inspection. On December 2, 2010, Mr. Macey stated that Ferndale Fire Department (Ferndale FD) advised Detroit Pump to remove filters from the booth. But, Fire Marshal Brian Batten of Ferndale FD stated on December 7 that Ferndale FD never advises anyone to remove filters from paint spray booths.

Please refer to the December 16, 2010, Violation Notice for additional details.

4 ft * 3 ft cold-cleaner

The unit may be described as a "sink on a drum". The solvent is stored in the drum (enclosure reservoir) of about 40 gallons capacity. Parts are placed in the sink area and solvent is pumped over the part. The solvent then drains back into the drum. Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner. Safety-Kleen services the degreasing unit.

The mechanically assisted lid was open and the cold-cleaner work-practice procedures were not posted during the FY 2014 inspection. **On February 21, 2014**, I gave DEQ's 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.

The 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. The unit may be considered new.

Safety-Kleen services the unit and replaces the spent solvent once every couple of months.

Sole vent used is Safety-Kleen Premium and Gold (Products Nos. 6605 and 6616): 100% Petroleum Distillate; Flash Point (FP) = 148 °F Tag Closed Cup; Auto Ignition Temperature = 480 °F; Specific Gravity = 0.77-0.80 at 60 °F, SG water = 1.0; Density = 6.4-7.0 pounds per gallon; Vapor Pressure (VP) = 0.2 mm Hg at 68 °F; Boiling Point (BP) = 350 °F; Flammable Limits = 0.7%v (LEL) - 5 %v (UEL).

Conclusion

Detroit Pump is in compliance with Rule 336.1201 / 336.1287(c).

FYI: VN

December 16, 2010

December 16, 2010

Mr. John Swantek, VP Sales
Detroit Pump & Mfg. Co.
450-D Fair Street, Building D
Ferndale, MI 48220

SRN: P0188, Oakland (63) County

Dear Swantek:

VIOLATION NOTICE

On December 2, 2010, the Department of Natural Resources and Environment (DNRE), Air Quality Division (AQD), conducted an inspection of Detroit Pump & Mfg. Co. ("Detroit Pump") located at 450-D Fair Street, Building D, Ferndale, Michigan. The purpose of this inspection was to determine Detroit Pump compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of

the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Paint Spray Booth	Rule 336.1201 (Permit-to-Install)	Detroit Pump installed the Painting Process without obtaining a Permit-to-Install prior to commencing the painting operation. The painting occurs in a booth without a control device (dry filter system for paint overspray particulate matter ^θ .
<p>^θ Alternatively, Detroit Pump may install a coating line that meets all of the Rule 336.1287(c) conditions:</p> <ol style="list-style-type: none"> 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. <p>On December 2, Mr. Mat Macey, Shop Manager, stated that Ferndale Fire Department advised removing the filters. Fire Marshal Brian Batten stated on December 7, 2010, Ferndale FD never advises anyone to remove filters from paint spray booths. When the filter system is installed and operated properly, i.e. without gaps and holes (snug and tight) in the filter system such that all exhaust air laden with paint overspray material get filtered, the booth meets Item # 2 above. Coating usage records must be kept to make sure that the coating usage never exceeds 200 gallons, as applied, minus water, per month.</p>		

During December 2, 2010, inspection, it was noted that Detroit Pump had installed and/or commenced operation of an unpermitted paint spray booth at this facility. The AQD staff advised Detroit Pump on December 2, 2010, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the painting process equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

In lieu of obtaining a Rule 201 permit, Detroit Pump may meet all the conditions of Rule 336.1287(c).

Please initiate actions necessary to correct the cited and submit a written response to this Violation Notice by January 6, 2011 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Detroit Pump believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the cited above and for the cooperation that was extended to me during my inspection of Detroit Pump. If you have any questions regarding the or the actions necessary to bring this facility into compliance, please contact me at the number listed below or the DNRE, SEMI-AQD (Warren), 27700 Donald Court, Warren, MI 48092-2793.

Sincerely,

Iranna Konanahalli

Air Quality Division
586-753-3741

ISK/VLL

cc: Ms. Teresa Seidel, DNRE
Mr. Thomas Hess, DNRE
Mr. Christopher Ethridge, DNRE

NAME Iranna Konanahalli DATE 03/13/2014 SUPERVISOR CTE