

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

P059528925

FACILITY: SHANNON PRECISION FASTENER LLC		SRN / ID: P0595
LOCATION: 800 EAST 14 MILE ROAD, MADISON HTS		DISTRICT: Southeast Michigan
CITY: MADISON HTS		COUNTY: OAKLAND
CONTACT: Jerry Iwanski , Distribution Plant Manager		ACTIVITY DATE: 02/23/2015
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Pending	SOURCE CLASS: Minor
SUBJECT: Self-initiated inspection.		
RESOLVED COMPLAINTS:		

On February 23, 2015, I conducted an unannounced self-initiated inspection of Shannon Precision Fastener, LLC located at 800 East 14 Mile Road, Madison Heights, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of **P0595**. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the administrative rules.

I entered the facility, presented photo identification, met with Mr. Jerry Iwanski, Distribution Plant Manager, and explained the purpose of the inspection. Mr. Jim Thornton, EMR/Quality, joined us shortly after the beginning of the inspection. Mr. Thornton is responsible for environmental compliance. Mr. Iwanski and Mr. Thornton escorted me throughout the inspection.

Shannon Precision Fastener has two other facilities in southeast Michigan; one on Stephenson Highway in Madison Heights and one in Auburn Hills. The facility on 14 Mile Road is primarily a distribution facility with a limited amount of manufacturing being performed at this site because a customer's specification requires their part to be packaged immediately upon production. While the two other Shannon Precision Fastener facilities perform manufacturing and heat treating, no surface coating activities are performed at those facilities. No heat treating is performed at the 14 Mile Road facility.

This building has 115,000 square feet of floor space. About 50% of the floor space is used for material storage and about 99% of the fastener parts are metric. I observed the receiving, staging, sorting and packaging areas. I observed a forklift battery charging area with an associated exhaust, which appears to be exempt from the permit requirements of R 336.1201 (1) per R 336.1285(l)(vii).

I observed a thread rolling machine and an associated quality control table with hood that exhausts air contaminants from heated muriatic acid. The acid is used to clean the surface of a rolled thread to allow the machine operator to see if the thread rolling dies are correctly aligned. The following is my compliance determination regarding the applicability of the R 336.1290 exemption from R 336.1201(1).

Per http://www.deq.state.mi.us/itslirsl/results.asp?Chemical_Name=&CASNumber=7647-01-0&cmdSubmit=Submit, the ITSL for hydrogen chloride (hydrochloric acid, a.k.a. muriatic acid) is 20 micrograms per cubic meter. Also, HCl is not listed in R 336.1122(f). Therefore, per R 336.1290(a)(ii)(A), it appears that a source may emit up to 1000 pounds of HCl uncontrolled, or 500 pounds of HCL controlled per month. Furthermore, the following conditions of R

336.1290 must be met:

- (b) A description of the emission unit is maintained throughout the life of the unit.
- (c) Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate that the emissions meet the emission limits outlined in this rule.
- (d) The records are maintained on file for the most recent 2 - year period and are made available to the air quality division upon request.

On March 17, 2015, I discussed the R 336.1290 exemption from R 336.1201(1) (Rule 201) with Mr. Thornton via telephone. We discussed the recordkeeping requirements in detail and I stated that these records must be kept to demonstrate the company's exempt status from Rule 201.

CONCLUSION

Shannon Precision Fastener has one process using muriatic acid that requires recordkeeping to demonstrate that the process is exempt from R 336.1201(1) per R 336.1290. All other processes and activities I observed are either not subject to air pollution control rules or are exempt from the air pollution control rules and do not require recordkeeping. I shall conduct a follow up inspection to determine if the recordkeeping initiated by Mr. Thornton meets the requirements of R 336.1290. Therefore, the compliance status of this facility is pending.

NAME

[Handwritten Signature]

DATE

3/25/15

SUPERVISOR

CJE