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DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

FACILITY: Attica Hydraulic Exchange, Inc.		SRN / ID: U501501393
LOCATION: 48175 Graiot Avenue		DISTRICT: Southeast Michigan
CITY: Chesterfield .		COUNTY: MACOMB
CONTACT: Dean Wyatt, Maintenance Supervisor		ACTIVITY DATE: 02/24/2015
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, February 24, 2015, MDEQ-AQD Staff Sebastian Kallumkal conducted a self-initiated inspection at Attica Hydraulic Exchange, Inc. located at 48175 Gratiot Avenue, Chesterfield, Michigan. The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994.

I arrived at the facility at about 1:30 PM and met Mr. Dean Wyatt, Maintenance Supervisor, Attica Hydraulic Exchange, Inc. I introduced myself and stated the purpose of my inspection. I showed him my credentials and provided him a copy of the DEQ Environmental Inspections: Rights and Responsibilities Publication. He informed me that G & L Industries which occupied the building previously has moved out of that location in about 1990. His company moved in about 2000. When his company occupied the building, it was empty. Later, I also met Mr. Ed Vienot, Production Manager.

During the pre-inspection meeting he explained to me about the processes at the facility. Attica Hydraulic Exchange is involved in the repair and remanufacturing of hydraulic pump components. It receives used pumps and remanufactures into usable hydraulic components.

The process involves taking apart all components of the used pumps, washing/cleaning, machining, grinding, and assembling of the pumps. The facility has many detergent based washers for parts. They also have three mineral spirit solvent cold cleaners. They are exhausted in to the general plant area. The cleaning solutions are kept are room temperature and not agitated. The processes are exempt from R336.1201 requirements pursuant to R336.1281(c) and R336.1281(h) respectively. The three cold cleaners are subject to R336.1707 which requires that:

- a) A cover shall be installed and the cover shall be closed whenever parts are not being handled in the cleaner.
- b) A device shall be available for draining cleaned parts, and the parts shall be drained not less than 15 seconds or until dripping ceases.
- c) Waste solvent shall be stored only in closed containers, unless demonstrated to be a safety hazard and disposed of in a manner such that not more than 20% by weight is allowed to evaporate into the atmosphere.
- d) A person responsible for the provisions of this rule shall develop written procedures for the operation of such provisions, and such procedures shall be posted in an accessible, conspicuous location near the cold cleaner

The CNC machining includes grinding, lathe, and milling. All processes exhausted inside the general inplant area. The processes are exempt from R336.1201 requirements pursuant to R336.1285(l)(vi)(B).

Other processes include:

Four Sand Blasters equipped with filters and exhausted the general in-plant area The processes are exempt from R336.1201 requirements pursuant to R336.1285(l)(vi)(B).

Rust inhibitor Treatment for the metal parts- Includes cleaning, blackening, rinsing, and application of rust inhibitor. The process is exempt from R336.1201 requirements pursuant to R336.1285(r).

Kohler Power Emergency Generator, installed on August 25, 2014. Natural Gas fired, 125 KW. The process is exempt from R336.1201 requirements pursuant to R336.1285(g). I informed them that the emergency generator is subject to the 40 CFR Part 60, Subpart JJJJ-New Source Performance Standard for Spark Ignition Reciprocating Internal Combustion Engines and that they need to comply with the requirements of this federal standard.

1 Paint Booth-The process is exempt from R336.1201 requirements pursuant to R336.1287(c). I informed them about the requirements of Rule 287(c). He told me that the facility uses less than 200 gallons of coating on a monthly basis.

Next, Mr. Wyatt accompanied me for an inspection of the facility. I inspected the paint booth. The filters were in place and not excessively dirty. I also inspected the machining area, sand blasters, parts washers and mineral spirit cleaners.

During the post inspection meeting they provided me the Safety Data Sheets for all coatings, cleaners and rust inhibitors and coating usage data.

Conclusion: The facility appears to be in compliance with all applicable air quality regulations. The facility needs to keep the cold cleaner covers closed when operator access is not necessary to reduce the solvent evaporation.

NAME S. Kallum kal

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SUPERVISOR