

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

U6314060124247

FACILITY: Michigan Custom Machines (MCM)	SRN / ID: U63140601
LOCATION: 22750 Heslip Dr.	DISTRICT: Southeast Michigan
CITY: Novi	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 01/23/2014
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2014 inspection of Graphic Michigan Custom Machines ("MCM")	
RESOLVED COMPLAINTS:	

**Michigan Custom Machines (MCM) (U-63-14- 0601)**  
**22750 Heslip Dr.**  
**Novi, Michigan 48376-4143**

**www.mcm1.com**  
**1-248-347-7900**

On January 23, 2014, I conducted a level 2 self-initiated inspection of Graphic Michigan Custom Machines ("MCM") located at 22750 Heslip Dr., Novi, Michigan 48376-4143. 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 inspection, Mr. Kirk Karem (Phone: 248-662-3273 or 248-347-7900-ext. 273; Cell: NA; Fax: 248-347-3064; E-mail: kirk.karem@mcm1.com), Shop Manager, and Mr. Rob Stough, Painter, assisted me.

For about two decades (since 1994), MCM is making / assembling fuel injector test machines. MCM is in this building for about 7 years. MCM is on the list of Inc. Magazine's 500 fastest growing companies: 2008 growth 75% and 2009 growth 109%.

MCM assembles the following test machines:

1. Hydraulic hybrid test machine
2. Fuel pump module endurance tester
3. Gasoline fuel injector calibrator
4. Diesel pump production test bench
5. Steering column lock endurance tester

The customers include GM, NSK, Husco, Borg-Warner, etc.

**Rule 287(c) Paint Spray Booth**

One solvent-based paint spray booth (12 ft. Width x 25 ft. Depth x 15 ft. Height) with a back-draft dry filter system is present. 20 filters are present. All coatings / paints are solvent-based. Primer and topcoat paints are used; no clearcoat paints are used. Paint usage records are not kept; Mr. Rob Stogh, Painter, stated that about 20 gallons of paint per month were used.

HVLP guns are used. Intake air filters are also present.

I asked Painter 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).

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c).

Upon keeping usage records, the coating booth meets all of the Rule 336.1287(c) conditions:

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.

## **Machines**

Lathes, surface grinders, belt sanders, chap saw, etc. are present. The machines do not exhaust to outside ambient air. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.285.

## **Cold-cleaner**

There is Graymills 3'x4' parts / cold-cleaner with spray a solvent tank. The cold-cleaners are 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.

One unit may be described as a "soaker tank". Soaker does not have a drum. Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner.

Mineral spirits containing no halogenated solvents is used. The Cold-cleaners are NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

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. During the FY 2014 inspection, the procedures were not posted. Mechanically assisted lid was closed.

Mineral Spirits 100% VOC solvent (Sherwin-Williams of Cleveland 216-566-2917)

100% VOC solvent. Flash Point (FP) = 100 °F TCC. Auto Ignition = NA °F. Boiling Point (BP) = 300-395 °F @ 760 mm Hg. Vapor Pressure (VP) = NA mm Hg at 68 °F. Specific Gravity

(SG, Water = 1.0) = 0.76. Density ( $\rho$ ) @ 68 °F = 6.35 lbs / gallon (0.760 kg /L). Flammability range = 1 %v (LEL) – 6%v (UEL).

### **Test equipment**

Each test equipment is equipped with Donaldson cartridge filter system. Pulse-jet air is used to clean the filters. The test equipment that has glossy paint on it although clearcoat is not used is tested before shipment.

The filtered air from the test equipment do not exhaust to outside ambient air. The testing test equipment is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.285.

### **Conclusion**

The paint spray booth and cold-cleaner are exempt from Rule 336.1201.

NAME J. K. Kavanahall DATE 02/06/2014 SUPERVISOR CJE