


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

U6314424525351

FACILITY: Frimo, Inc. - Plant No. 2		SRN / ID: U63144245
LOCATION: 31132 Century Drive		DISTRICT: Southeast Michigan
CITY: Wixom		COUNTY: OAKLAND
CONTACT: 		ACTIVITY DATE: 05/20/2014
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2014 Inspection of Frimo, Inc.- Plant No. 2		
RESOLVED COMPLAINTS:		

Frimo, Inc. - Plant No. 2 (U-63-14-4245)
31132 Century Drive
Wixom, Michigan 48393-2073

Phone: (248) 668-3147

Permit-to-Install: Rules 285, 287 exempt process equipment.

On May 20, 2014, I conducted a level 2 self-initiated inspection of Frimo, Inc. ("Frimo"), located at 31132 Century Drive, Wixom, Michigan. 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. Ray Lukasik (Phone: 248-668-3147; Fax: 248-668-3040; Cell: 248-939-3056; E-mail: lukasik.r@frimo.com), Operations Director, assisted me.

Frimo, an American subsidiary of a German Frimo company is a builder of interior automotive tooling and machinery. Polyurethane (PU) is used as insulation material for refrigerators, in upholstered furniture or sport articles. In the automotive industry instrument panels, door trims, headliners, seats, headrests, steering wheels or bumpers and spoilers are typical applications. At this Wixom facility, prototype equipment is present. Also, urethane foaming, vacuum foaming, press laminating, NC cutting, lathes, milling, cutting equipment are present.

Frimo manufacture in two plants: one located on Century Court and the other on Century Drive.

Frimo builds, repairs, services tools and equipment for:

1. Polyurethane processing
2. Polyurethane spraying
3. Flexible trimming
4. Polyurethane foaming
5. Punch press
6. Thermo foaming
7. Laminating
8. Edge folding
9. Joining and gluing

Rule 285 machines

Mills, lathes and machining machines 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 336.1285 (l).

287 (b) paint spry booth – spray cans only

8 ft W * 8 ft. D * 8 H paint spray booth is present. Back draft filters are present. Only spray cans are is used.

I asked Mr. Lukasik to install the filters such that they fit, at all times, snugly without gaps and holes.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(b).

Cold-cleaner

There is one 3'x4' parts /cold-cleaner is present. 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.

The unit may be described as a "sink on a 55-gallon drum" The solvent is stored in the drum (enclosure reservoir) of about 55 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.

Mechanically assisted lid was closed during FY 2014 inspection. The work-practice procedures were not posted in 2014.

On May 20, 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-cleaners are NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

Conclusion

Spray booth, cold-cleaner and machines are exempt from Rule 336.1201 per Rules 287, 285.

NAME

J. S. Lennanahall

DATE

6/4/2014

SUPERVISOR

CTE