

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

U63160186433588

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| FACILITY: Henkel Corporation-Madison Heights Facility | | SRN / ID: U631601864 |
| LOCATION: 32100 Stephenson Highway | | DISTRICT: Southeast Michigan |
| CITY: Madison Heights | | COUNTY: OAKLAND |
| CONTACT: Thomas Snell, Facility Manager | | ACTIVITY DATE: 03/03/2016 |
| STAFF: Sebastian Kallumkal | COMPLIANCE STATUS: Compliance | SOURCE CLASS: |
| SUBJECT: Onsite Inspection | | |
| RESOLVED COMPLAINTS: | | |

On Thursday, March 3, 2016, I conducted a self-initiated inspection at Henkel Corporation –Madison Heights facility located at 32100 Stephenson Highway, Madison Heights, 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 about 1:30 PM. At the facility I met Mr. Thomas Snell, Facility Manager. I introduced myself and stated the purpose of my visit. I provided him the “DEQ Environmental Inspections: Rights and Responsibilities” Brochure.

During the pre-inspection meeting, he informed me that the facility is primarily an R & D facility and performs some pilot plant operations for spray coatings and dip coatings. The facility has about 350 employees. It has three buildings: Chemistry Building, Administrative Building, and Adhesive, Loctype, Tech services.

The facility conducts chemical analyses of new formulations, and coatings from outside customers. Tech services group conducts tests for pretreatment cleaners, rust inhibition, dip coating, etc. They also conduct pilot studies for various electroplating lines. The facility also has an indoor waste water treatment system.

The facility has four emergency generators: one diesel fired and three are natural gas fired. These generators undergo diagnostic tests for 10 minutes each week. Diesel generator is more than 25 years old. Two of the generators are less than 10 years old. I informed him about the applicable requirements such as area MACT (40 CFR 63, Subpart ZZZZ) requirements and NSPS (40 CFR 60, Subpart JJJJ) for the emergency generators. He agreed to comply with the requirements. The engines are exempt from R336.1201 – Permit to Install requirements pursuant to Rule 285(g)- Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input.

The facility has one solvent based parts washer (cold cleaner).

R 336.1281 Permit to install exemptions; cleaning, washing, and drying equipment.

Rule 281. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(h) Cold cleaners that have an air/vapor interface of not more than 10 square feet.

However these cold cleaners are subject to R336.1707. I provided Mr. Snell a copy of the operating procedure prepared by DEQ which also includes Rule 707.

After the pre-inspection meeting, he accompanied me for an inspection of the facility. We inspected the two buildings with R&D processes. The facility’s operations appear to be exempt from permit to install requirements (Michigan Administrative Rule R336.1201) pursuant to R336.1283 (1).

R 336.1283-Permit to install exemptions; testing and inspection equipment

Rule 283. (1) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(a) Pilot processes or process equipment utilizing T-BACT used for any of the following:

- (i) Chemical analysis.
 - (ii) Physical analysis.
 - (iii) Empirical research.
 - (iv) Theoretical research.
 - (v) The development of process or process equipment design and operating parameters.
 - (vi) The production of a product for field testing.
 - (vii) The production of a product for clinical testing of pharmaceuticals.
 - (viii) The production of a product for use as a raw material in the research and development of a different product.
- (b) Laboratory equipment.

(2) The pilot processes and process equipment excluded from the requirement of R 336.1201(1) pursuant to the provisions of subrule (1)(a) of this rule do not include pilot processes or process equipment used for any of the following:

- (a) The production of a product for sale, unless such sale is only incidental to the use of the pilot process or process equipment.
- (b) The repetitive production of a product using the same process or process equipment design and operating parameters.
- (c) The production of a product for market testing or market development.

During post-inspection meeting, I advised him about finding out the heat input/power output, installation dates for the emergency generators and complying with the applicable requirements.

Conclusion: The facility appears to be in compliance with applicable State air quality requirements. Compliance with requirements for the emergency engines was not verified at this time.

NAME Sebastian Kallimka

DATE 3/10/16

SUPERVISOR CJE