

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

N801672480

<b>FACILITY:</b> DIAMOND RACING PRODUCTS	<b>SRN / ID:</b> N8016
<b>LOCATION:</b> 23003 DIAMOND DR, CLINTON TWP	<b>DISTRICT:</b> Warren
<b>CITY:</b> CLINTON TWP	<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Ken Haglund , Operations Manager	<b>ACTIVITY DATE:</b> 06/18/2024
<b>STAFF:</b> Noshin Khan	<b>COMPLIANCE STATUS:</b> Non Compliance
<b>SUBJECT:</b> self initiated on-site inspection	<b>SOURCE CLASS:</b> MINOR
<b>RESOLVED COMPLAINTS:</b>	

On Tuesday, June 18, 2024, I, Noshin Khan, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, performed a self-initiated inspection of Diamond Racing Products located at 23003 Diamond Drive, Clinton Township, Michigan 48035 (SRN: N8016). The purpose of the inspection was to determine the facility's compliance status 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 Public Act 451, as amended (Act 451); and the AQD administrative rules. I also inspected Diamond Racing Products located down the street at 35075 Automation Drive, Clinton Township, Michigan 48035 (SRN: P1067). P1067 is the "Shipping and Receiving" building for Diamond and N8016 is the "Manufacturing" building.

I first visited the Diamond Racing Products "Manufacturing" building on Friday, June 14, 2024, at 1:30PM. I spoke to front desk staff to explain the purpose of my visit, and they said that the plant manager had left for the day. I said I would return the following week.

On June 18, I arrived at the Diamond Racing "Manufacturing" building (N8016) at 1PM and met with Ken Haglund, Operations Manager. He explained the facility processes for both buildings. Diamond Racing Products manufactures pistons, which involves metal fabrication and occasional coating of the pistons. The operating hours for the "Manufacturing" building (N8016) are 24 hours a day, 5 days a week and operates 3 shifts. Depending on demand, the building operates on some Saturdays. The operating hours for the "Shipping and Receiving" building (P1067) are 6AM-5PM, Monday through Friday. Ken said that Diamond Racing Products has about 250 employees across all shifts and departments.

I inspected the "Manufacturing" building (N8016) before Ken accompanied me to the "Shipping and Receiving" building (P1067). This report details my inspection of the "Manufacturing" building (N8016). Please see source information for SRN P1067 for details on my inspection of the "Shipping and Receiving" building.

The facility shapes pistons using CNC's which are all fully enclosed. The machining/milling performed using these machines is exempt from permit requirements per Michigan Air Pollution Control Rule 285(2)(l)(vi)(B). The CNC's take up a majority of the plant floor.

Ken showed me an area where staff manually perform finishing of pistons. Any emissions from the milling/shaping performed in this process are released into the general in-plant environment and this process is also exempt per Rule 285(2)(l)(vi)(B).

I observed a cold cleaner and a conveyORIZED parts washer. The cold cleaner was not in use and had its lid open. I issued a verbal warning that the parts washer lid should remain closed when not in use per Rule 707(3)(a). I also did not observe written procedures for the operation of the cold cleaner posted in a conspicuous location near the cold cleaner as required by Rule 707(4). I provided Ken a copy of the AQD "How to Operate Your Cold

Cleaner" instruction sticker to post near the device. The cold cleaner has an air/vapor interface of less than 10 square feet and is exempt from permit requirements per Rule 281 (2)(h).

The conveyORIZED parts washer uses a mixture of deionized water and an alkaline cleaner (Bonderite C-AK212 Alkaline Cleaner). Ken provided the SDS for the cleaner and the chemical components are not volatile organic compounds. The conveyORIZED parts washer consequently operates as an aqueous based parts washer and is exempt from permit requirements per Rule 281(2)(k).

Ken walked me to a room where I observed all waste oil, coolants, and cleaners stored in tightly sealed containers. Inside the plant I observed a large storage container where waste metal chips are stored. I did not observe fallout from this container. Ken said that all waste is collected by a disposal company for proper disposal. He also walked me through a room where quality checks are performed.

I did not observe any other processes with possible air emissions.

The facility is currently in violation of Rule 707 for operating a cold cleaner without posted instructions and for keeping the lid open when not in use. A verbal warning was issued during the inspection. Ken provided follow up confirming that the lid is kept closed when not in use, and sent a picture of the posted instructions. Due to these corrective actions, a violation will not be issued at this time.

NAME Nathan Khan DATE 07/11/2024 SUPERVISOR K. Kelly