

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

P106772479

FACILITY: Diamond Racing Products	SRN / ID: P1067
LOCATION: 35075 Automation Drive, CLINTON TWP	DISTRICT: Warren
CITY: CLINTON TWP	COUNTY: MACOMB
CONTACT: Chris Susalla , Facility Manager	ACTIVITY DATE: 06/18/2024
STAFF: Noshin Khan COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: unannounced on-site inspection	
RESOLVED COMPLAINTS:	

On Tuesday, June 18, 2024, I, Noshin Khan, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, performed an on-site inspection of Diamond Racing Products located at 35075 Automation Drive, Clinton Township, Michigan 48035 (SRN: P1067). 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 23003 Diamond Drive, Clinton Township, Michigan 48035 (SRN: N8016). 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 "Shipping and Receiving" building (P1067). Please see source information for SRN N8016 for details on my inspection of the "Manufacturing" building.

Ken and I met with Chris Susalla, Facility Manager. He explained that the facility has a silkscreen machine and coating machine used for pistons requiring coating per customer specifications. Some milling and sandblasting is also performed. I observed that much of the facility is used for warehousing of finished products and parts.

Chris walked me to the silkscreen machine and coating machine-- both of which use the same silkscreen coating. The silkscreen machine is exempt per Michigan Air Pollution Control Rule 287(2)(e). I observed that the spray coating machine has its own exhaust and Chris explained that the machine has a downdraft exhaust that goes through charcoal filters which are replaced about once a week. Staff said that the facility uses about 2-5 gallons of coating per month.

After the last inspection in 2019, the facility had started tracking the monthly coating use in order to claim permit exemption Rule 287(2)(c) for a coating line using less than 200 gallons of coating per month. However, the Coating Manager who maintained these records left the company in the past few years and the facility has not maintained monthly coating records. The facility is in violation of Rule 201 for not maintaining the records needed to qualify for the exemption.

Chris was able to provide purchase records that indicate that the facility uses between 2 and 5 gallons per month, as I was told during the inspection. The records provided after the inspection are available on the AQD shared drive at the following address: <S:\Air Quality Division\STAFF\Noshin Khan\FY24\P1067 Diamond Racing>.

The facility orders the coating in 5 kg units, and according to the coating technical data sheet (TDS), the density of the coating is 1.3 g/mL. This converts to about 1.02 gallons per 5 kg unit ordered. Of the purchase orders provided for the past year, the highest purchase was during November 2023 of 4 units, which is about 4.07 gallons. The purchase record indicates that 11.22 gallons were ordered in the past year, which is below the 200 gallon/month limit for the exemption. I am requesting that the facility start tracking its monthly coating usage again and send me their calculations for the next six months to ensure compliance. A violation will not be issued at this time.

I observed the enclosed sandblasting stand which is equipped with its own particulate control and exhausts into the general in-plant environment. I also observed a fully enclosed machining/milling CNC used to shape pistons. According to staff, it is operated a few times a week. These processes are exempt per Rule 285(2)(l)(vi)(B).

Chris also showed me a wash station used for the pistons consisting of three basins: one holds hot water, one holds cold water, and one contains an alkaline cleaner solution (Bonderite C-AK212 Alkaline Cleaner mixed with deionized water). The parts are dipped for about a minute and the basins have no cover. Ken Haglund provided the SDS for the Bonderite Cleaner and the components are not volatile organic compounds. The washing station is exempt from permit requirements per Rule 281(2)(k) for aqueous based parts washers.

During my walkthrough I did not observe any large stationary boilers or emergency generators, and staff said there were none at the facility.

Diamond Racing Products is in violation of Rule 201. The coating usage records required to qualify for exemption Rule 287(2)(c) have not been maintained. However, purchase records indicate that the facility's coating use is below the 200 gallons/month limit for the exemption. I am requesting that the facility update their monthly coating usage spreadsheet and send me their calculations for the next six months to ensure compliance. A violation notice will not be issued at this time.

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