

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

N794771147

<b>FACILITY:</b> ND INDUSTRIES		<b>SRN / ID:</b> N7947
<b>LOCATION:</b> 1819 THUNDERBIRD RD, TROY		<b>DISTRICT:</b> Warren
<b>CITY:</b> TROY		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Ajay Jain , EHS Manager		<b>ACTIVITY DATE:</b> 02/29/2024
<b>STAFF:</b> Owen Pierce	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> Minor
<b>SUBJECT:</b> FY 24 Compliance Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On February 29, 2024, I (Owen Pierce EGLE - Air Quality Division) performed a scheduled targeted inspection of ND Industries located at 1819 Thunderbird Road, Troy, Michigan. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451. Upon arrival, I met with Ajay Jain, EHS Manager and Stephanie Jarrett, Senior Environmental Engineer at Fishbeck, and conducted a pre-inspection meeting where I introduced myself, presented my credentials, and stated the purpose of the inspection.

During the pre-inspection meeting, Ajay explained the facility's processes and equipment. ND Industries makes chemical adhesives for locking and sealing applications for automobile nuts, bolts, and fasteners to improve strength and adhesion. The ND Industries facility at 1819 Thunderbird Road fabricates machinery for all ND Industry facilities across the country, and during the inspection I did not observe any adhesive making taking place.

According to Ajay, there have been no recent process or equipment changes, and there are no cold cleaners, boilers, or emergency generators at the facility. Following the pre-inspection meeting, Ajay and Stephanie, lead me on a tour of the facility.

### Facility Walk-through Observations

During the tour of the facility, I observed many different types of tools and machinery used to make various parts and machines for ND Industries facilities across the country. All tools observed appear to be exempt from the requirement in R336.1201 to obtain a permit to install per R336.1285(2)(l)(vi)(B) because they are used to cut and/or grind metal or wood and the emissions are released into the general in-plant environment.

Additionally, I observed a spray booth near the rear of the facility. According to Ajay, the facility uses this spray booth only once per week and uses approximately 5 gallons or less per month. I observed that dry filters were properly installed in the booth. The spray booth appears to be exempt from the requirement in R336.1201 to obtain a permit to install per R336.1287(2)(c).

### Compliance Evaluation

In order to determine compliance with the 287(2)(c)(i) exemption requirement of the coating use rate equaling 200 gallons or less, I requested usage records for the spray booth for the previous 6 months. The highest recorded gallons of coating used was 13 gallons in October 2023. Therefore, the spray booth meets the requirements for the rule 287 exemption.

### Conclusion

Based on the observations made during the inspection, and an analysis of the requested records, ND Industries is in compliance with the conditions and requirements of the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451.

NAME Owen PierceDATE 4/4/2024SUPERVISOR K. Kelly