

P0754
MAVIL

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

P075445957

FACILITY: SMW Manufacturing, Inc.		SRN / ID: P0754
LOCATION: 25575 Brest Road, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Dave Manton ,		ACTIVITY DATE: 03/06/2018
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 3/6/2018
 TIME OF INSPECTION : 11:00 am
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Dave Marton
 FACILITY PHONE NUMBER : 517-596-3300

FACILITY BACKGROUND

SMW Manufacturing enhances metal parts for the auto industry using cold form processing. The facility also does metal machining on metal parts. The facility is located in a shared industrial building just east of Beech-Daly Road between Goddard Road and Northline Road in Taylor.

REQUIRED PPE

For the onsite inspection, I wore safety shoes, safety glasses and hearing protection.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. The facility does not have any prior violations.

PROCESS EQUIPMENT AND CONTROLS

The facility has 8 CNC machines, which vents directly to general plant air.

The facility performs a multistep ferritic nitro carburizing (FNC) heat treat process, which vents directly to the general plant air. First the parts are washed with an alkaline cleaner and a hot water rinse. Next the parts are pickled in a sulfuric acid solution, followed by a cold-water rinse to remove the acid. After a second hot water rinse, the parts pass through a phosphate rinse followed by a cold-water rinse. The part is finished with a coating to prevent rust.

The ammonia tank is stored outside of the facility and is equipped with a chiller and labeled. The facility has one boiler for heating purposes. This boiler operates on natural gas, though Mr. Marton was unsure of the size of the boiler.

INSPECTION NARRATIVE

I arrived at the facility to perform an unannounced inspection. I met with Dave Marton. Mr. Marton explained the process to me before we walked through the facility. Kevin, a salesman, joined our discussion to help determine the technical aspects of the process. Metal parts are treated in different processes at this site, including heat treating and cold forming. At the time of the inspection, the facility was running prototype parts and was not yet operating on a production basis.

APPLICABLE RULES/PERMIT CONDITIONS.

The PTI 173-16 was issued on October 21, 2016 for the 1000-gallon storage tank. The special conditions are as follows:

- I. Emission Limits – NA
- II. Material Limits – NA
- III. Process/Operational Restrictions
 1. Compliance – The refrigerated storage container is labeled properly and appears to have been installed according to Department of Labor and Economic Growth General Industry Safety Standards, Part 78.
 2. Undetermined – Mr. Marton is not responsible for maintenance operations and it was unclear who is responsible. However, the tank appeared to be in good working order and well maintained.
 3. Noncompliance – The facility has an emergency response plan. However, Mr. Marton was unaware that this plan needed to be approved by the local fire department. Mr. Marton stated that he would have the plan approved by the local fire department.
 4. Compliance – The tank is installed in the back of building, which is more than 50 feet from the property line, and more than 215 feet from any residences.
 5. Undetermined – During the onsite inspection, no transfers occurred.
 6. Undetermined – The vapor return lines were not inspected during the onsite inspection.
 7. Compliance – Nitrogen stabilizer has not been added to any permanent stationary storage tank.
- IV. Design/Equipment Parameters
 1. Undetermined – The safety relief valves were not inspected during the onsite inspection.
 2. Compliance – An emergency shut off valve has been installed at this facility.
 3. Undetermined – No transfers were occurring during the onsite inspection. Therefore, the bulkhead, anchorage or equivalent system could not be evaluated.
 4. Undetermined – No transfers were occurring during the onsite inspection. Therefore, the back pressure check valves and liquid lines were not evaluated.
 5. NA – The tank was installed in 2016. Therefore, five years has not passed since installation, so the hoses do not need to be replaced.
 6. Undetermined – The vapor or liquid lines were not evaluated during the onsite inspection.
 7. Noncompliance – No sign was present at the entrance of the facility identifying emergency contact information. Mr. Manton stated that he was unaware of this requirement and that he would be adding a sign to the front lobby.
- V. Testing/Sampling – NA
- VI. Monitoring/Recordkeeping
 1. Undetermined – Mr. Manton was unsure who at the facility was responsible for collecting and maintaining the records.
 2. Noncompliance – The facility has an emergency response plan. However, Mr. Manton was unaware that this plan needed to be reviewed by the local fire department.
- VII. Reporting
- VIII. Stack/Vent Restrictions – NA
- IX. Other Requirements – NA

The pickling line is exempt from permitting by Rule 285 (r)(ii) because the pickling line vents directly to general plant air.

More information on the heat treat process will need to be obtained to accurately determine compliance. Also, the boiler size will be verified during the next onsite inspection in order to determine the appropriate exemption.

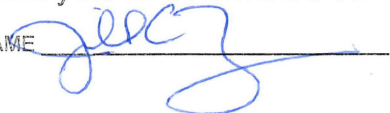
MAERS REPORT REVIEW

NA

FINAL COMPLIANCE DETERMINATION

It appears that SMW Manufacturing is not operating in compliance with the conditions of permit 173-16. Mr. Manton was made aware of the requirements that were not being met. A violation notice will not be sent at this time. An inspection is planned to occur within the next fiscal year to determined compliance.

NAME



DATE

10/10/18

SUPERVISOR

