

P0754  
MANILA

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

P075447849

FACILITY: SMW Manufacturing, Inc.		SRN / ID: P0754
LOCATION: 25575 Brest Road, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Mike Bolotta, Process Manager		ACTIVITY DATE: 12/10/2018
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 12/10/2018  
 TIME OF INSPECTION : 1:20 pm  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Michael Bolotta, Processing Manager  
 FACILITY PHONE NUMBER : 517-596-3300  
 EMAIL : mbolotta@smw-mfg.com

### 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.

### INSPECTION NARRATIVE

I arrived at the facility perform an unannounced inspection. I met with Michael Bolotta. Mr. Bolotta explained the process to me while we walked through the facility. Metal parts are treated in different processes at this site, including heat treating and cold forming. The facility performs heat treating and cold forming lines. The heat treating line with ammonia has only run prototypes and is not yet operational.

On January 11, 2019 I sent Mr. Bolotta the attached email, requesting additional information. Mr. Bolotta responded that he would need to meet with Mr. Dave Manton to

gather the requested information.

### **APPLICABLE RULES/PERMIT CONDITIONS.**

The PTI 173-16 was issued on October 21, 2016 for the 1000-gallon anhydrous ammonia 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. Compliance – The ammonia tank is leased through Tanner Industries. Tanner Industries is responsible for performing visual inspections once a year as well as each time the tank is filled.
  3. Compliance – The emergency response plan is attached to this report. The tank was last inspected by Chief Portis from Taylor Fire Station #1 in December 2016. The plan is to be reviewed annually, however, no ammonia has been added to the tank since the plan was initially reviewed and no changes have been made to the process, which is still in a testing phase.
  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. However, Mr. Barton has stated that only trained personnel deliver the ammonia.
  6. Undetermined – The vapor return lines were not inspected during the onsite inspection. Mr. Barton has stated that each time ammonia is transferred, all lines are visually inspected by the supplier and any necessary repairs are made. The facility is leasing the tank from Tanner Industries, who inspect the tank annually.
  7. Compliance – Nitrogen stabilizer has not been added to any permanent stationary storage tank.
- IV. Design/Equipment Parameters
  1. Compliance – The safety relief valves were installed less than 5 years ago and appear to be operating properly. All valves are inspected annually by Tanner Industries.
  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. Compliance – No transfers were occurring during the onsite inspection. During each transfer, the tank and all associated equipment is visually inspected.
  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. Compliance – A copy of the sign posted at the facility is attached to this report.
- V. Testing/Sampling – NA
- VI. Monitoring/Recordkeeping
  1. Compliance – a copy of the maintenance records is attached to this report.
  2. Compliance – The facility has an emergency response plan which was reviewed by the local fire department in December 2016.
- VII. Reporting – NA No accidental releases have occurred since the tank was installed

in 2016.

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.

The FNC line is exempt from permitting by Rule 282 (a)(i). This exemption was changed on December 20, 2016 to exclude from the exemption heat treating processes utilizing ammonia; however, this line was installed in October 2016 when the exclusions were limited to heat treated processes using materials, oil-coated parts, or oil quenching. This line is currently no operating, and there is no plan or estimated date to begin operating this line.

A boiler is used at the facility that is powered by natural gas and has a heat input rating of 4,186 BTU (41.9 Therms / hr). Therefore the boiler is exempt from permitting by Rule 282(b) (i).

### MAERS REPORT REVIEW

NA

### FINAL COMPLIANCE DETERMINATION

It appears that SMW Manufacturing is operating in compliance with the conditions of permit 173-16 as well as all state and federal regulations.

NAME

JDC Zimmerman

DATE

7/19/19

SUPERVISOR

JK