

U-63-11-0266

FY2018 Insp-

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

U6311026643033

FACILITY: Aero, Inc.		SRN / ID: U63110266
LOCATION: 1010 W. West Maple Road, Walled Lake		DISTRICT: Southeast Michigan
CITY: Walled Lake		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 12/14/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2018 inspection of Aero, Inc.		
RESOLVED COMPLAINTS:		

Aero, Inc. (U-63-11-0266, Misc-1406)
1010 W. West Maple Road
Walled Lake, Michigan 48390-2935
Phone: 248-669-08408580

Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations

On December 14, 2017, I conducted a level 2 self-initiated **FY 2018 inspection** of Aero, Inc. located at 1010 W. West Maple Road, Walled Lake, Michigan 48390-2935. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the FY 2018 inspection, Mr. Frank Geisler IV (Phone: 248-669-4085; Fax: 248-669-7435; Mobile: 248-343-1511; E-mail: FRGIV@aol.com), Engineering Tech, and Mr. Terry Preston (Phone: 248-669-4085; Fax: 248-669-7435; Mobile: NA; E-mail: Aero3275@aol.com), Plant Manager, assisted me.

Mr. Frank Geisler III (Phone: 248-669-4085; Fax: 248-669-7435; Mobile: 586-924-6836; E-mail: Aero3275@aol.com), President and Owner, was out of office.

Aero is a metal fabricator for automobile industry. The plant performs welding, stamping (stamping business reduced due to competition from Mexico), robotic welding, cutting, tube bending, laser cutting, tube fabrication, etc. Tubes are used as trailer hatches. Production has come down due to competition from Canada and Mexico as result of currency exchange rates (weaker Canadian dollar) and labor rates (Mexico). Aero serves automobile, agriculture, marine, materials handling, etc. industries.

One 3 ft. * 3 ft. cold-cleaner

There is one 3 ft. * 3 ft. parts cold-cleaner which was installed in CY 2002 (new: after July 1, 1979). Cold-cleaner is subject to Rule 336.611 or 336.1707 (new) depending on if it is existing or new. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(2)(h) or Rule 285 (2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

In 2005, I found the cleaner open when not in use; I asked Mr. Geisler to ensure that the cold-cleaner is kept closed at all times when idled. In 2005, I sent, via US Mail, to Aero a copy of DEQ's "cold-cleaner operating procedures"

Crystal Clean (Model No. 1602 and Serial No. 13107783) unit may be described as a "sink on a drum" type cold-cleaner with spray brush. 30-gallon drum acts as a reservoir of solvent. Crystal Clean services the degreasing unit; biannually dirty solvent is exchanged for clean solvent. No halogenated solvent is used. Lid is mechanically assisted.

Mechanically assisted lid is present. During the FY 2018 inspection, mechanically-assisted lid was kept closed and the work-practice procedures were posted as required by Rule 707.

In 2011, the operating procedures were not posted. I gave again (the previously mailed [Sep 2005] procedures were not posted) in May 2011 a copy of DEQ's "cold-cleaner operating procedures".

During the FY 2018 inspection, mechanically assisted lid was kept closed and the work practice decals were posted.

Safety-Kleen (800-752-7869) Premium Solvent 6605, a petroleum solvent, is used. 100% VOC.

Flash Point FP = 150 °F. Auto Ignition AI = 440 °F. Boiling Point BP = 350-470 °F. Vapor Pressure VP = 0.4-1 mm Hg at 68 °F. Specific gravity SG = 0.8. Density ρ = 6.6-6.8 pounds per gallon. Flammability Range FR = 1 %v (LEL) – 9.3 %v (UEL), by volume.

The Cold-cleaner is NOT Subject to: NESHAP/ MACT T (40 CFR, Part 63, Subpart T) since solvents containing halogenated compounds are not used.

Metal cutting and bending machines

Metal cutting and bending machines are present. The process emits only large particles and there is no exhaust to outside ambient air. The metal cutting machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

Laser cutting machine.

Laser cutting machine (GE Fannuc LVD C 2500-E), with Donaldson Torit DEC Cartridge filters, is present. The filters (3 cartridges) are cleaned once every few minutes by pulse-jet air depending upon pressure differential (?P: as indicated by four lights). The metal particles are collected in a 30-gallon drum. Filtered air is exhausted to in-plant environment. Steel plates are cut for shapes and holes. The laser cutting machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(l).

Aero bought new laser cutting machine, which will replace this existing machine by February 2018.

Robotic welding machines

5 robotic and 1 hand-held welding machines with capture hoods are present. Air is discharged outside without filtration. The welding machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(i).

Hydraulic oils are used in the machines.

Bridgeport & Ram machines

Two Bridgeport drilling machines and one Ram mill are present. The emissions are **not** discharged to outside ambient air. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(l).

Conclusion

Aero is in compliance with air quality regulations including cold-cleaner operating procedures. All processes are exempt from Rule 336.1201 (Permit-to-Install) pursuant to either Rule 336.1285 or Rule 336.1281.

NAME J. J. McManis

DATE 01/16/2018

SUPERVISOR Joyce

