

M4558  
MANILADEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

M455868989

FACILITY: Bodycote Thermal Processing Inc.		SRN / ID: M4558
LOCATION: 38100 Jay Kay Drive, ROMULUS		DISTRICT: Detroit
CITY: ROMULUS		COUNTY: WAYNE
CONTACT: Ryan Gainey , General Manager		ACTIVITY DATE: 09/12/2023
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site Inspection FY2024		
RESOLVED COMPLAINTS:		

**AQD On-site Inspection, September 12, 2023.**

AQD staff conducted an On-site Inspection for FY 2023 of Bodycote Thermal Processing, Inc., located at 38100 Jay Kay Drive in the City of Romulus. The purpose of the inspection was to determine the facility's compliance with applicable state and federal air pollution rules and regulations, and AQD's PTI 47-19. Ryan Gainey, Plant Manager accompanied AQD staff during this inspection.

**FACILITY BACKGROUND**

Bodycote Thermal Processing, Inc is located at 38100 Jay Kay Drive, Romulus, MI. This company has multiple locations throughout the world. The company moved into the Romulus facility in April 2018. Currently, there is no sign on the building. Precision Hardware operated at this location prior to Bodycote. There are 12 employees, and the facility operates Monday through Friday, 24 hours a day. They are heat treating transmission parts for the automotive industry; currently GM is their only client. The facility is still operating in "trial phase" and has not sold any production parts.

**INSPECTION NARRATIVE**

Ryan Gainey, Plant Manager greeted me as I entered the facility. He stated that company policy is that we attend an Opening Meeting on Zoom with certain Bodycote staff. It was the same persons that I talked with at the Canton Plant (attendees list attached). I explained that my objective was to determine compliance with AQD PTI No. 47-19, issued on June 21, 2019. After the Zoom call, I was informed by Ryan that PTI 47-19 was not current. He presented me with a copy of PTI No. 47-19A which was issued on October 6, 2021. At that point, I was surprised because I had prepared for the inspection with the only permit in our file. I thanked him for the copy of 47-19A and suggested a plant tour would get me familiar with the facility. Then I would return at a later date after reviewing 47-19A.

We then discussed the facility operations and conducted a plant tour. Notes from the plant tour:

- No rain caps on stacks
- Daily and monthly check of the flame curtain
- Emergency shut off valve for ammonia – inside; never had to use
- No hoses present on the ammonia system
- Two portable tanks presently are empty and there are no hookups
- Monthly walkthrough of system – recorded
- Tanner is the company that supplies ammonia and checks dates on valves
- No emergency generators on site
- Endogenerator has a catalyst
- Concerning the flare; the following information is from the furnace manufacturer. It is pilot ignited to ensure it operates continuously when atmospheric gases are injected into the furnace during the heat treat cycle. Its function as a safety device is intrinsic to the safe use of the furnace.

**Here is a summary of the heat-treating steps:**

- Receive parts and build a load
- Prewash (water based rust preventative solution)
- Pre-ox/temper heat treat
- Hardening
- Hot Chamber Oil Quench
- Post Washer to clean oil
- Tempering
- Load break down

**EXEMPTIONS**

Shot peening appears exempt per R 336.1285(2)(l)(vi)(B): equipment for carving...shot peening...metals...which meets any of the following: (B) equipment that has emissions that are released only into the general in-plant environment.

Washers appear to be exempt per R 336.1285(2)(l)(iii): equipment for the surface preparation of metals by use of aqueous solutions, except for acid solutions.

Nitrogen storage tank appears to be exempt per R 336.1284(2)(j): Pressurized storage of....nitrogen...

**COMPLIANCE DETERMINATION**

At this time, facility appears to be in compliance with conditions evaluated in this report.

NAME

Bj Klawns

DATE

6/6/24

SUPERVISOR

JK**Ryan Gainey**

GENERAL MANAGER

Classical Heat Treatment - Romulus

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