RESOLVED COMPLAINTS:

DEPARTMENT OF ENVIRONMENTAL QUALITY 11-63-14-2671

AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated Inspection

U6314267136064 FACILITY: 3M Abrasive Systems Division SRN / ID: U63142671 LOCATION: 30975 Century Dr. Wixom **DISTRICT:** Southeast Michigan CITY: Wixom COUNTY: OAKLAND CONTACT: **ACTIVITY DATE: 08/09/2016** STAFF: Iranna Konanahalli **SOURCE CLASS:** SUBJECT: FY 2016 3M Abrasive Systems Division ("3M")

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3M Abrasive Systems Division (U-63-14-2671) fka Wendt USA Diacraft Division 30975 Century Dr. Wixom, Michigan 48393-2064

Cold-cleaners: Both Safety-Kleen Model 91 Aquaous VAT parts-cleaner (March 2015) and Safety-Kleen solvent-based cold cleaner (2011 (Wendt)) are permanently removed.

On August 09, 2016, I conducted a level 2 self-initiated inspection of 3M Abrasive Systems Division ("3M"), fka Wendt USA Diacraft Division, located at 30975 Century Dr., Wixom, Michigan 48393-2064. 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 inspection, Mr. Dave J. Smoltz (Phone: 248-926-2500-ext NA or 248-668-3646-Direct; Cell: NA; Fax: 248-926-2525; E-mail:djSmoltz@mmm.com), Production Supervisor. assisted me.

Mr. James R. Peters (Phone: 248-926-2500-ext 230 Cell: NA; Fax: 248-926-2525; Email:ipeters@mmm.com), Production Manager, separated about December 2015. Mr. Roger Cassidy, Engineer, retired about February 2015.

Founded in 1999, Wendt USA Diacraft Division, which 3M purchased about December 2012, is in the business of development, manufacturing, distributing grinding machines for hard materials, precision steel, glass, etc.

3M (formerly German Wendt USA) facility at Wixom makes super abrasive grinding wheels. In addition, 3M services and rebuilds grinding machines. About 2012, rebuilding was outsourced to 3M. Germany

Grinding wheels of variety of sizes are made using synthetic diamonds. Diamonds of variety particle sizes are mixed with binders according to recipes in the lab. Wheels (1-20 inches diameter) are used. Diamond molds are baked at 180 °C in the presses; 14 presses in all are present. Most binders are based upon glass, phenolic resins, metals, epoxy (component A & B 3M products), etc.

Kilns – commercial

Molds after baking are sintered at 1500 °F. 7 sintering ovens are present. In addition, 5 ovens

for curing glue and dehydration of materials are present. No exhaust to outside ambient air. All ovens are electrically heated. Sintering is a powder metallurgy process that fuses particles (adhere to one another) via heat and compression. Sintering temperature is significantly lower than metallic melting temperature.

The kilns are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I).

Glue application

Glue application on diamond layer and aluminum and steel core. Glue is not sprayed but brushed. Glue is two-component epoxy. Upon mixing component A & B, glue usable time is about one hour. The glue usage is less than 2 gallons per day and all emissions are released to in-plant environment. The glue application process exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(a).

Machines

Raw material metals are cut per desired sizes. 5 CNC and 6 manual lathes are present. The metallic particulate laden exhaust from the machines ducted to either indoor dust collector or outdoor dust collector. Indoor dust collector is equipped with cartridge filters and 55-gallon drum as hopper. Outdoor dust collector (Micro Air Dust Collector) consists of 12 cartridges and 55-gallon drums (2) as hoppers. Pulse-jet air is used to clean the cartridges. From the outdoor (but not indoor) dust collector, air is further cleaned using two filters (one pre-filter and one HEPA filter located is inside the building within a muffler that reduces indoor noise [from 90 to 50 dB]) for worker safety and comfort.

The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 (l).

Mold release booths (2)

Only spray cans (about 48 cans per month - aggregate) are used in two booths (5 ft. W * 5 ft. H * 3 ft. D) for mold release application. The back-draft filters are present. The exhaust gases are discharged via two stacks; one stack for each booth. I asked 3M to install and inspect the filters such that they fit, at all times, snugly without gaps and holes.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(b).

Paint spray booth - idle

There is a paint booth (5 ft. W * 5 ft. H * 5 ft. D) which uses only spray cans. I asked. 3M to install filters such that they fit, at all times, snugly without gaps and holes.

During FY 2014 inspection, I found some holes and gaps in the back-draft filter system. During FY 2016 inspection, I asked 3M to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. However, this booth is idled due to outsourcing rebuilding activities to 3M, Germany.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(b).

Laser etching machine

One laser etching machine (RS-Marker, S-line) is present to etch names, etc. The machine is equipped with a fume collection system.

The machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I).

Sandblasting machine

One sandblasting machine with Empire dust collector is present. Upon filtration, all emissions are released to in-plant environment. The sandblasting machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I).

Parts-cleaner

One Safety-Kleen Model 91 Aquaous VAT parts-cleaner is removed about March 2015 by Safety-Kleen due to high rent. Also, solvent-based Safety-Kleen cold cleaner was removed about 2011 (Wendt).

Conclusion

All process equipment are exempt from Rule 336.1201 as they, as stated above, satisfy the conditions of exemptions in the Rules 285 and 287.

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