M4403
MAWLA

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

M440329281

FACILITY: D N R INC		**SRN / ID:** M4403
LOCATION: 38475 WEBB DR, WESTLAND		**DISTRICT:** Detroit
CITY: WESTLAND		**COUNTY:** WAYNE
CONTACT: Guy Roberts , Vice President		**ACTIVITY DATE:** 04/21/2015
STAFF: Jill Zimmerman	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 04/21/2015

TIME OF INSPECTION : 10:15 am

LEVEL OF INSPECTION : II

NAICS CODE : 325998

EPA POLLUTANT CLASS : HAPs

INSPECTED BY : Jill Zimmerman

PERSONNEL PRESENT : Guy Roberts, Vice President

FACILITY PHONE NUMBER : 734-722-4000

FACILITY FAX NUMBER : 734-722-1200

FACILITY BACKGROUND

D-N-R, Inc. is located in the City of Westland, north of Ford Road and west of Hix, in a primarily industrial and commercial area. This company has about 20 employees. The facility operates one shift per day, five days per week, with additional work when needed.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received since the last compliance inspection on 12/13/2012. No Violation Notices (VN) have been issued since the last inspection.

PROCESS EQUIPMENT AND CONTROLS

D-N-R, Inc. degreases metal parts such as tubing, fittings and stampings, mainly for automotive suppliers. Cleaning the parts takes place in one of two degreasing tanks. Each tank contains approximately 240 gallons of trichloroethylene (TCE), which is used as the degreasing solvent. Each tank is equipped with a freeboard chiller and an idling-mode cover to control solvent emissions. Waste solvent is shipped off-site for recovery. The facility adds an additional 55 gallon drum of TCE when needed, which is usually once a month. The facility also does some die cutting of metal parts. The process does not create any additional emissions.

Since my last inspection, the facility has added a small die cutting line. This process

does not add any additional emission for the facility. For this process, the parts are cleaned in the solvent. Then a notch is cut from the part. Finally, the part is cleaned in the solvent for a second time.

INSPECTION NARRATIVE

I arrived at the facility at 10:15 am, and met with Mr. Guy Roberts, Vice President, who discussed the process during the inspection. Metal parts are washed in trichloroethylene (TCE). The parts are loaded into an appropriate size basket and placed in the 220 gallon tank. The remaining 75 gallons of TCE are in the still. The parts are sprayed with additional TCE during this process. The TCE is boiling in the tank, and the vapors are used to clean the part. A freeboard chiller is located above the TCE to liquefy the vapor. The TCE is filtered to remove debris so that it can be reused. TCE is used because it cleans the part better than other chemicals. During the inspection both tanks were in different stages of the cleaning process. One tank is capable to be used for ultrasonic cleaning of the parts, though this process does not have an impact on the emissions.

The facility also has a rust removing process. Rusty parts are dipped in a small series of tanks. Initially, the parts are dipped in Rust-B-Gone (RBG). The parts are then dipped in a 5% solution of sodium nitrite followed by a 20% solution of sodium nitrite. The RBG is soluble in water. According to the MSDS, the RBG is 40 to 50 % VOC, and has an evaporation rate less than water. The RBG contains no components that are hazardous under OSHA regulations. During the inspection, the tanks containing the RBG solution, and the sodium nitrite solutions were covered. This process would be exempt from the Permit To Install based on Rule 285 (dd)(ii).

During the onsite visit, the die cutting line was operating. A small notch was being cut from a small metal part.

APPLICABLE RULES/PERMIT CONDITIONS

This facility is considered a major source of hazardous air pollutant emissions because the potential to emit any single hazardous air pollutant (trichloroethylene) regulated by the Clean Air Act, Section 112 exceeds 10 tons per year. Furthermore, the facility is not subject to any New Source Performance Standards (NSPS) (40 CFR 60). Finally, the facility is subject to the Maximum Achievable Control Technology (MACT) standard for halogenated solvent cleaning (40 CFR 63 Subpart T).

D-N-R is currently operating under ROP MI-ROP-M4403-2012. FGVAPORDEGREASERS includes EU-VD01 and EU-VD02 which are nearly identical Detrex degreaser units.

The current Title V operating permit requires annual and semi-annual deviation reports, which are due March 15 and September 15 of each year. During the onsite inspection, I requested this form from the facility, which was due on March 17, 2015. Mr. Roberts said that his brother handled this part, and he would check with him on the form. I said that I would also follow up with an email request of the form. A faxed copy of this form was received on April 30, 2015. A hard copy was placed in the mail and should be received soon. The faxed copy is attached to this report.

MAERS REPORT REVIEW

The facility submitted a MAERS report for the year 2014 on March 17, 2015. According to this report, 3,420 gallons of solvent were used, and 7.8 tons of TCE were emitted.

FINAL COMPLIANCE DETERMINATION

DNR, Inc. appears to be operating in compliance with all state and federal regulations. The ROP certification form was received later than the March 15, 2015 deadline, but has now been received. At this time, the facility appears to be operating in compliance with all conditions of the ROP.

NAME Jill Zimmerman DATE 5/1/15 SUPERVISOR JK