

N2175  
FY2018 Insp

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

N217543056

FACILITY: Line Precision, Inc.		SRN / ID: N2175
LOCATION: 31666 W 8 MILE RD, FARMINGTON		DISTRICT: Southeast Michigan
CITY: FARMINGTON		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 12/19/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2018 inspection of Line Precision, Inc.		
RESOLVED COMPLAINTS:		

**Line Precision, Inc. (N2175)**  
31666 West Eight Mile Road  
Farmington Hills, Michigan 48336-5207.

**N2175 reassigned (2011): Reighard International Trucks Corporation (N2175) → Line Precision, Inc. (N2175). Reighard moved out before 1995.**

**Soil remediation: Reighard International Trucks Corporation (Navistar) conducted the remediation.**

**Void: Permit-to-Install No. 475-89 dated December 3, 1990 for Waste Oil Furnace, was voided on March 01, 2011, based upon FY 2011 inspection.**

On December 19, 2017, I conducted a level-2 self-initiated **FY 2018 inspection** of Line Precision, Inc. ("Line Precision") located at 31666 West Eight Mile Road, Farmington Hills, Michigan 48336-5207. 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.

**N2175: Reighard International Trucks Corporation**

Reighard moved out of this building before 1995. Navistar conducted soil remediation. According to MDEQ's LUST Database, Navistar cleaned up Facility ID No. 00017786 by January 25, 1994 (close date). Used Oil (Leak ID C-113893) was released as discovered on September 19, 1993.

Permit-to-Install No. **475-89**, dated December 3, 1990, for Waste Oil Furnace, was voided on March 1, 2011, based upon FY 2011 inspection.

**N2175: Line Precision, Inc.**

During the FY2018 inspection, Mr. Randy Clarke (Phone: 248-474-5280; Fax: 248-474-9270; E-mail: rClarke@LinePrecision.com), President & Owner, assisted me.

Line Precision builds experimental prototypes for automotive, heavy industries and universities. Line Precision has eight wood cutting / grinding machines, one cold-cleaner and one paint spray booth. There is no production activity; only prototyping.

## Wood cutting machines

Eight (8) wood cutting, sawing, grinding machines are present. All machines are equipped with one common particulate matter control system located outside the building. Each machine has a dedicated capture system. The captured particulate laden exhaust from each machine is ducted to a common ventilation manifold. The particulate laden exhaust is transported to a particulate matter control system consisting of one cyclone for large / heavy particles and followed by one baghouse for all particles, especially small; both are connected in series. Each (cyclone and bag filter system) is equipped with one 55-gallon drum as a hopper; i.e. two (2) 55-gallon hoppers in all. The bags are shaken once per day at 2:00 a.m. on an automated schedule. The cyclone reduces wear and tear on bags by removing high momentum large particles from the gas stream. Thus cleaned / filtered air is recycled into the plant in all seasons (summer or cooling and winter or heating). I asked Mr. Clarke to empty the 55-gallon drums promptly. The hoppers are checked once per month and emptied, if needed. The bags are twenty (20) years old. I asked Mr. Clarke to hire a contractor to check bags for integrity on a periodic basis (e.g., annually). As a non-production, prototyping facility, Line Precision uses baghouse on as needed basis (not continuously).

The wood cutting and grinding equipment are exempt from Rule 336.1201 pursuant to Rule 336.1285(2)(l).

## Paint spray booth

One paint spray booth (W = 4 ft. \* D = 2 ft. \* H= 4 ft.) with back-draft filters is present. The booth was installed about 1998. I found gaps and holes in the filter system during both FY11 & FY13 inspection. I asked Mr. Clarke to install the filters such that they fit, at all times, snug and tight without gaps and holes.

However, painting has not been done for several years. All painting is outsourced. The filter area is closed using a wooden board.

Only spray cans were used; no spray gun. The booth is exempt from Rule 336.1201 pursuant to Rule 336.1287(2)(b).

## One Safety-Kleen cold-cleaner

One **Safety-Kleen** (Model No. 34.1 parts washer, NASCAR Performance) parts cleaning unit is present. The unit may be considered "a-sink-on-a-drum". Parts are placed in the sink area and solvent is pumped over the part. The solvent then drains back into the reservoir (drum). Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner. Oils and grease are the typical soils that are removed.

Each cold-cleaner is subject 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.

Mechanically assisted lid is present. I asked Mr. Clarke to ensure the lid is closed at all times when idled as found it open during the FY11 inspection.

I gave again during FY 2013 inspection DEQ decal for posting work practice procedures. During both FY2011 & FY2013 inspections, common sense work-practice

procedures were not posted. Such posting is required by the Rule 707. During FY 2018 inspection, DEQ decal was posted and the mechanically-assisted lid was closed.

Degreasing solvent used is mineral spirits supplied by Safety-Kleen (800-669-5740): Safety-Kleen Premium Gold Solvent (Virgin & Recycled). SDS ID # 82658. Safety-Kleen of Richardson, TX 75080 (800-669-5740)

100% VOC solvent. Flash Point (FP) = 148 °F TCC (Tag Closed Cup). Auto Ignition = 480 °F. Boiling Point (BP) = 350 °F @ 760 mm Hg. Vapor Pressure (VP) = 0.2 mm Hg at 68 °F. Specific Gravity (SG, Water = 1.0) = 0.77-0.82. Density ( $\rho$ ) @ 68 °F = 6.4-6.7 pounds / gallon (0.77-0.82 kg /L). Flammability range = 0.7 %v (LEL) – 6%v (UEL).

### **Machining**

Five horizontal machining centers (MORI-SEIKI, Hass) are present. The machines do not exhaust particulates laden gases to outside ambient air.

The machines are exempt from Rule 336.1201 pursuant to Rule 336.1285(2)(l).

### **Conclusion:**

Permit-to-Install No. **475-89**, dated December 3, 1990, for Waste Oil Furnace, was voided on March 1, 2011. Line Precision operates Rules 285 and 287 exempt process equipment in compliance with the conditions of exemption.

NAME *J. W. Manahall* DATE *01/17/2018* SUPERVISOR *Joyce B.*

