

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

N2297
FY 2017 Insp.

N229741614

FACILITY: MacLean Royal Oak, LLC		SRN / ID: N2297
LOCATION: 3200 W 14 MILE RD, ROYAL OAK		DISTRICT: Southeast Michigan
CITY: ROYAL OAK		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 08/31/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2017 inspection of MacLean Royal Oak, LLC ("MacLean") dba MacLean-Fogg Component Solutions, A MacLean-Fogg Company		
RESOLVED COMPLAINTS:		

N2297 - SAR - 2017 08 31

MacLean Royal Oak, LLC (N2297)
A MacLean-Fogg Company
3200 W. 14 Mile Road
Royal Oak, Michigan 48073-1699

Name Change (Jan 2012): Industrial and Automation Fasteners (N2297) → MacLean Royal Oak, LLC (N2297)

DBA Change (Jan 2012): MacLean Vehicle Systems or MVS → MacLean-Fogg Component Solutions

Web: www.MacLeanFogg.com

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 August 31, 2017, I conducted a level 2 self-initiated **FY 2017 inspection** of MacLean Royal Oak, LLC ("MacLean") dba MacLean-Fogg Component Solutions, A MacLean-Fogg Company, located at 3200 W. 14 Mile Road, Royal Oak, Michigan 48073-1699. 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) rules.

During the inspection, Mr. John E. McAuley (Phone: NA; Fax: 248-280-3840; Cell: 248-520-9137; E-mail: jMcAuley@MacLeanFogg.com), Environmental Health and Safety Specialist, assisted me.

Mr. Gregory A. Dean (Phone: 248-658-2707; Fax: 248-280-3840; Cell: 248-933-4289; E-mail: gDean@MacLeanFogg.com), Quality Supervisor, was present but did not participate. About 2016, Mr. Dean transferred his environmental & safety duties to Mr. McAuley.

Assembly machines (10) put caps on nuts. Six existing assembly machines were transferred to Troy facility. Six brand new assembly machines were bought and installed (2013 thru 2014).

Two 3 ft. x 4 ft. parts cold-cleaners

There are two 3 ft. x 4 ft. parts cold-cleaners. Cold-cleaners are subject rule 336.611 or 336.1707 (new) depending on if it is new or existing. 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.

Both FY2006 and FY2011 inspections revealed one of two cold-cleaners had a lid open. I asked Mr. Dean to ensure that lids were kept closed at all times

Two cold-cleaners are soaker tank type. To replace one of two machines transferred to Troy facility, MacLean bought one brand new machine and installed about 2014: Wel-Bilt parts-cleaner machine (No. 141223, 140-gallon capacity)

On August 31, 2017, mechanically assisted lid was closed while idling. Also, the operating procedures were not posted. I gave new decals as previously posted decals were soiled.

I sent in 2005 to MacLean a copy of DEQ's "cold-cleaner operating procedures". Again, on November 13, 2014, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common-sense work practice in the procedures.

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

Degreasing solvent used is mineral spirits supplied by Cadillac Oil Corp. of Detroit (313-365-6200).

The solvent contains aliphatic hydrocarbons (98%). 100% VOC. Density = 6.560 pounds per gallon. VP = 2 mm Hg at 60 °F, Sp. Gravity = 0.790 at 68 °F, FP = 105 °F. BP = 315-398 °F. Auto-ignition = 535 °F. Flammability range = 1%v (LEL) – 6%v (UEL).

Conclusion

MacLean-Fogg is in compliance with air quality regulations and conditions of PTI exemptions (Rules 281, 285).

NAME

Bill Hannah

DATE

8/22
2017

SUPERVISOR _____