

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

U6311058626302

FACILITY: Eaton Steel Corporation		SRN / ID: U63110586
LOCATION: 10221 Capital St.		DISTRICT: Southeast Michigan
CITY: Ferndale		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 08/04/2014
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2014 inspection of Eaton Steel Corporation ("Eaton")		
RESOLVED COMPLAINTS:		

Eaton Steel Corporation (U-63-11-0586)
10221 Capital St.
Ferndale, Michigan 48220-2134

Complaint C-14-00842 (Burt Hoover, 10641 Albany, Ferndale. 06/12/2014. Eyes get red and burning sensation. White smoke)

On July 11 and August 1 & 4, 2014, I conducted a complaint investigation and a level 2 self-initiated inspection of Eaton Steel Corporation ("Eaton") located at 10221 Capital St. (previously, 10550 Galaxie Ave.), Ferndale, Michigan 48220-2134. 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.

The inspection is a result of the complaint (C-14-00842).

During the inspection, Mr. David Gunsberg (Phone: 248-837-2388; Fax: NA; Toll-free: 800-527-3851; E-mail: dgunsberg@eatonsteel.com; Web: www.eatonsteel.com), VP Human Resources and General Counsel, assisted me.

Mr. Steven Lutren (Phone: 248-398-3434-ext. 2376; Fax: 248-398-6914; Toll-free: 800-527-3851; E-mail: slutren@eatonsteel.com; Web: www.eatonsteel.com), Plant Manager, retired about 2013.

Eaton steel buys and sells steel bars. Eaton buys hot rolled and cold engineered steel bars. There no is no process equipment except parts cleaner and steel rod cutting machines to cut steel to desired size. Eaton sells its products to customers such as Caterpillar.

Across the street (Capital) Eaton operates Apollo Heat Treating and Processing, LLC (10400 Capital St.) and Titan Metallurgical Lab.

16 metal cutting machines

16 (increased: 9 to 16 during 2011-2014) steel rod cutting machines are present. Vegetable oil is used for cooling metal cutting; oil is recycled / reused. Each machine has its own capture device and control device for particulate matter / oil mist emissions. The control device is known as Mist Buster. The filtered air is released to in-plant environment.

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

(l).

Rule 287(b) Paint Can Spray

Steel bars coated for color coding purposes. Only spray cans are used. About 30 cans per month are used.

The spray can painting is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(b).

Two cold-cleaners

There are two (2) Craymill 3'x4' parts cold-cleaners with spray a brush and a solvent tank. The cold-cleaner is subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r) (iv). Existing cold cleaner is placed into operation prior to July 1, 1979. New cold cleaner is placed into operation on or after July 1, 1979. This is a brand new cold cleaner.

The solvent is stored in the tank (enclosure reservoir) of about 50 gallons capacity. Parts are placed in the sink area and solvent is pumped over the part. The solvent then drains back into the drum. Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner.

Mechanically assisted lid is present; it was closed during the inspection. Eaton Steel services the parts cleaner. The operating procedures were not posted.

On August 04, 2014, I gave Mr. David Gunsberg 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.

Mineral spirits containing no halogenated solvents is used. The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

Mineral Spirits aliphatic hydrocarbons petroleum distillates (CAS 64742-88-7)

100% VOC solvent. Flash Point (FP) = 105 °F TCC. Auto Ignition = 450 °F. Boiling Point (BP) = 318-388 °F @ 760 mm Hg. Vapor Pressure (VP) = 5 mm Hg at 68 °F. Specific Gravity (SG, Water = 1.0) = 0.78. Density (ρ) @ 68 °F = 5.3 lbs / gallon. Flammability range = 0.6 %v (LEL) – 7%v (UEL).

Conclusion

Metal cutting, spray can painting, degreasing, etc machines / processes are exempt from Rule 336.1201.

NAME: J. J. Pennington DATE: 8/8/2014 SUPERVISOR: CTE