

U-63-14-4245  
FY2016 InspDEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

U6314424536124

FACILITY: Frimo, Inc. – Plant No. 2		SRN / ID: U63144245
LOCATION: 31132 Century Drive, Wixom		DISTRICT: Southeast Michigan
CITY: Wixom		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 08/19/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2016 inspection of Frimo, Inc. Plant 2 or Building 2 ("Frimo")		
RESOLVED COMPLAINTS:		

U63 144245 - SAR - 2016 08 19

**Frimo, Inc. – Plant No. 2 (U-63-14-4245)**  
**31132 Century Drive**  
**Wixom, Michigan 48393-2073**

**Permit-to-Install: Rules 285, 287 exempt process equipment.**

**Not subject to: NESHAP / MACT T for Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; Federal Register / Vol. 59, No. 231 / Friday, December 2, 1994). No halogenated solvent.**

On August 19, 2016, I conducted a level 2 self-initiated inspection of Frimo, Inc. Plant 2 or Building 2 ("Frimo"), located at 31132 Century Drive, Wixom, Michigan. 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 FY 2016 inspection, Mr. Kip Secord (Phone: 248-668-3160; Fax: 248-668-3040; Cell: 248-202-9204; E-mail: Secord.K@frimo.com), Asst. Plant Manager, Mr. Ryan Dziekan (Phone: 248-668-3199; Fax: 248-668-3040; Cell: 248-939-2451; E-mail: Dziekan.R@frimo.com), Quality Manager, and Mr. Sante DiDonato (Phone: 248-668-3160; Fax: 248-624-8823; Cell: 248-756-9061; E-mail: DiDonato.S@frimo.com), Operations Director - Machine Build, assisted me.

About December 31, 2015, Mr. Ray Lukasik (Phone: 248-668-3147; Fax: 248-668-3040; Cell: 248-939-3056; E-mail: lukasik.r@frimo.com), Operations Director, retired.

Frimo, an American subsidiary of a German Frimo company is a builder of interior automotive tooling and machinery. The operations are conducted in two separate buildings: Plant 1 & Plant 2. Polyurethane (PU) is used as insulation material for refrigerators, in upholstered furniture or sport articles. In the automotive industry instrument panels, door trims, headliners, seats, headrests, steering wheels or bumpers and spoilers are typical applications. At this Wixom facility, prototype equipment is present. Also, urethane foaming, vacuum foaming, press laminating, NC cutting, lathes, milling, cutting equipment are present.

Frimo manufactures in two plants: one located on Century Court and the other on Century Drive. At Plant 1, Frimo builds, repairs, services tools and equipment for:

1. Polyurethane processing
2. Polyurethane spraying
3. Flexible trimming
4. Polyurethane foaming
5. Punch press
6. Thermo foaming
7. Laminating
8. Edge folding
9. Joining and gluing

At Plant 2, Frimo builds machinery and assemblies. Thus built machines are shipped auto suppliers.

**Rule 285 machines**

Mills, lathes and machining machines are present. The machines do not exhaust to outside ambient air. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

**287 (b) paint spry booth – spray cans only**

8 ft. W \* 8 ft. D \* 8 ft. H paint spray booth is present. Backdraft filters are present. Only spray cans are is used.

During FY 2016 inspection, I found some gaps and holes at the backdraft filter system allowing overspray particulate laden air emit unfiltered to outside ambient air. I asked Frimo to install 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).

**Cold-cleaner**

There is one 3 ft. x 4 ft. Gray Mills parts /cold-cleaner with 55-gallon drum is present. The cold-cleaner is idle or hardly used. The cold-cleaners are 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 cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

The unit may be described as a "sink on a 55-gallon drum" The solvent is stored in the drum (enclosure reservoir) of about 55 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 was closed during FY 2016 inspection. The work-practice procedures were not posted in 2016.

On May 20, 2014, and again on August 19, 2016, 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.

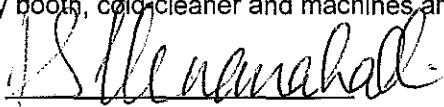
Solvent: 100% n-Methyl-2 Pyrrolidone, CAS # 000872-50-4 (872-50-4),  $C_5H_9NO$

100% VOC solvent. Odor = Amine like. Flash Point (FP) = 91 °C. Auto Ignition = 270 °C. Boiling Point (BP) = 202 °C @ 760 mm Hg. Vapor Pressure (VP) = 0.342 mm Hg at 25 °C. Specific Gravity (SG, Water = 1.0) = 1.02. Density (p) @ 68 °F = 8.5 lbs. / gallon (1.02 kg /L). Flammability range = 1.3 %v (LEL) – 9.5%v (UEL).

**Conclusion**

Spray booth, cold-cleaner and machines are exempt from Rule 336.1201 per Rules 287, 285.

NAME



DATE

8/24/2016

SUPERVISOR

