

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

U63180915546658

FACILITY: H.A. King		SRN / ID: U631809155
LOCATION: 5038 Leafdale		DISTRICT: Southeast Michigan
CITY: Royal Oak		COUNTY: OAKLAND
CONTACT: Kelly Carmona , Manager		ACTIVITY DATE: 10/02/2018
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-Initiated Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, October 2, 2018, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff, I, Adam Bognar, conducted an unannounced self-initiated inspection of H.A. King, located at 5038 Leafdale, Royal Oak, MI 48073. The purpose of this inspection was to determine the facility's compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules. This facility currently operates without a permit.

I arrived at the facility at around 1 pm. I walked upstairs to the office area and met with Ms. Kelly Carmona, Manager. I identified myself, provided credentials, and stated the purpose of the inspection. Ms. Carmona gave me a tour of the facility.

HA King operates pressing machines that bond rubber to metal. The manufactured parts are used for in various applications for vibration dampening, shock absorbing, and noise control. Examples of manufactured parts are shipping container shocks, automotive motor mounts, and crankshaft vibration dampening. Some of their clients are military grade so extensive quality testing is performed on each part. The rubber is molded to the metal component using one of two processes: transfer molding or compression molding. Each process is done on a separate press operating at about 300°F.

There are 8 full time employees operating one shift from 8 am to 5 pm. During the last AQD inspection in 2004, HA King had much more business and was operating continuously in three shifts. The workload at HA King has declined since then. Other than the reduction in workload, there does not appear to be any major changes to the HA King manufacturing process since 2004.

An adhesive is used to bond the metal to rubber. The adhesive is applied prior to the molding process. The two adhesives used are Chemlok 205 and Chemlok 252. Ms. Carmona maintains records of adhesive usage (see attached). Usage is about 2.25 gallons per month and 5.5 gallons per month, respectively. Chemlok 205 contains the HAPs ethylbenzene, formaldehyde, lead, and xylene. Chemlok 252 contains the HAPs ethylbenzene, lead, and xylene. Chemlok 220, which contained tetrachloroethylene (TCE), is no longer used. The safety data sheets for these adhesives can be found in the AQD file for H.A. King. Both methylethylketone (MEK) and toluene are used to thin the adhesive. MEK usage is around 4 gallons per month and toluene usage is around 2.5 gallons per month.

Despite the hazardous chemicals used in these adhesives, the adhesive application process appears to be exempt from Rule 201 requirements pursuant to Rule 287 (2)(a). Application rate of adhesives is less than two gallons per day and the emissions are exhausted into the in-plant environment. There is other equipment such as small grinders, cutters, and enclosed sandblasting equipment that appear to be exempt from Rule 201 requirements pursuant to Rule 285 (2)(I)(vi). All of this equipment is exhausted to the in-plant environment.

Compliance Determination

This facility appears to be in compliance with the requirements of the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules.

NAME Adam Bognar DATE 10/15/18 SUPERVISOR SK