

N2961

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

FY 2017 Insp

N296141074

FACILITY: ANDERSEN & ASSOCIATES		SRN / ID: N2961
LOCATION: 30575 ANDERSON COURT, WIXOM		DISTRICT: Southeast Michigan
CITY: WIXOM		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 08/10/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2017 inspection of Andersen & Associates, Inc., ("Andersen"), dba Andersen Material Handling ("AMH")		
RESOLVED COMPLAINTS:		

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**Andersen & Associates (N2961; U-63-09-0604 was also used)
dba Andersen Material Handling
30575 Andersen Court (formerly, 30575 Beck Road)
Wixom, Michigan 48393-2817**

Phone: 248-960-6800 for Anderson & Associates

Void: PTI# 677-91 (N2961) dated August 29, 1991, for Flexo Printing Process (Pur-pak aka Elopak) was voided on December 13, 1993.

Rules 281,285 and 287

N2961 SRN reassign (Apr 2013): Pur-Pak, Inc. (aka Elopak, Inc at New Hudson under SRN N2712) → Andersen & Associates, Inc. dba Andersen Material Handling. SRN N2712 is reassigned to Henrob Corpoation about 2013 and Henrob obtained AQD permits.

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 10, 2017, I conducted a level-2 self-initiated FY 2017 inspection of Andersen & Associates, Inc., ("Andersen"), dba Andersen Material Handling ("AMH"), located at 30575 Andersen Court (formerly, 30575 Beck Road; City of Wixom renamed this address as 30575 Andersen Court), Wixom, Michigan 48393-2817. 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 Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. David Streefkerk (Phone: 248-960-6800-ext. 6828; Cell: 248-521-0465; E-mail: dStreefkerk@AndersenMH.com), VP, Renewed and Rental, Andersen Assoc., and Mr. Jeremy Truran (Phone: 248-668-2604; Cell: E-mail: jTruran@AndersenMH.com), Operations Manager, assisted me.

Andersen Associates, which was established in 1960, conducts fork-lift (Raymond [mostly electric], Komat'su [mostly propane]) sales, services, repairs, maintenance leasing business.

Besides, Andersen provides to its customers material handling solutions. Andersen deals in both electric and propane trucks.

One 287(2)(c) Paint Spray Booth (15 ft. W* 15 ft. D * 20 ft. H)

One paint spray booth (15 ft. W* 15 ft. D * 20 ft. H; open at the front) to paint fork-lifts for repairs and maintenance is present. The booth is equipped with a back-draft filter system consisting 40 filter panels for paint overspray particulate control. The filters are located at two back corners. I asked Mr. Truran to install the filters snug and tight such that there were no holes and gaps, which I found during the FY 2017 inspection. Mr. Truran promised to reinstall the filters, correctly. Although coating usage records were not kept, I am convinced that the usage is substantially less than 200 gallons per month. Based upon production volume, Mr. Truran estimated about 5-10 (<< 200) gallons of coatings per month usage. Coatings are always red and black. All coatings are water based. Primer, clearcoat (CC) coatings are not used; i.e., only basecoat (BC) coatings.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(2)(c).

Upon keeping usage records (an estimate is available: 5-10 << 200 gallons of coatings per month), the coating booth meets all of the Rule 336.1287(2)(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

Three identical Safety-Kleen Parts Cleaners

There are three identical (reduced from 5 [2009] to 3 [2013]) Safety-Kleen cold-cleaners (4 ft. * 2 ft.). The units were installed about 2010 (after 1979). Each cold-cleaner is subject rule 336.1611 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. As the cold-cleaners were installed after 1979 (2010), they are considered new cold-cleaners. I gave, on November 5, 2009, Mr. Truran a copy of DEQ's "cold-cleaner operating procedures" and asked him to follow the decal's common sense work practice procedures.

"Sink on vat" cold-cleaners (Safety Kleen Model No. 44.1 Solvent VAT Parts Cleaner) are equipped with mechanically assisted lids. Truran would train employees regarding proper work-practice.

Mechanically assisted lids were closed. Operating procedures were posted. Safety-Kleen services the units.

Safety-Kleen solvent (Product Code: 6605 or 6616) is used for degreasing. The solvent is petroleum naphtha consisting of 100% hydrocarbons derived from petroleum distillation.

100% VOC. Flash Point (FP) = 148 °F (Tag Closed Cup). LEL = 0.5-0.8 %. UEL = 5-6%. BP = 300-350 °F. Ried Vapor Pressure (VP) = 0.1 psia at 100 °F. Specific gravity (SG) = 0.77-0.80.

VOC = 100%. Density (ρ) = 6.4-6.7 pounds of VOC per gallon (770-800 g/L = 0.770-0.800 kg/L) of solvent.

5-gallon solvent still

5-gallon distillation still (Safety Kleen NASCAR Performance Model No. 701300) is present. At night, contaminated solvent is placed in 5-gallon container using a plastic bag. Contaminated solvent is heated to 104 °F at night and solvent vapors generated from dirty solvent by supplying enthalpy (latent heat) of evaporation are condensed using a condenser. Condensed pure solvent is collected in 5-gallon container. Thus condensed pure solvent is reused in the degreasing HVLP guns. Practically dry sludge remaining in the bag upon overnight evaporation of solvents is disposed of as non-hazardous RCRA solid waste. Sludge containing bags are stored in a closed container until disposed of. Hence, hazardous solid waste is converted to non-hazardous solid waste and, as an added bonus, solvent is recovered and reused. Safety Clean services this equipment as well.

One 5-gallon water tank is present to provide cooling water to the condenser.

The 5-gallon distillation still (<< 55 gallons) is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(u).

RCRA / Hazardous Waste

Andersen (US EPA Generator Identification No. MIR000006320) received RCRA / Hazardous Waste regulatory violations (October 2, 2009) for record-keeping, land restriction notices, SQG requirements, etc. from MDEQ-OWMRD (Mike Busse, Office of Waste Management and Radiological Protection, Warren). Andersen achieved compliance by June 7, 2010.

Purpak / Elopak

Purpak shutdown Andersen Court converting (cardboard to carton e.g. milk carton) plant and moved out of this Wixom location to 30000 South Hill, Road New Hudson (N2712, this SRN now reassigned to Henrob). The current occupant is Anderson & Associates, which moved into this building in 1996 according to Mr. David Streefkerk. About 1993, Pur-Pak's Wixom plant was shut down. This (Wixom) and other operations (Walled Lake and Bluffton) were consolidated into one facility in New Hudson. Norway Headquarters (HQ) renamed Purpak as Elopak about 1995.

According to Ms. Connie Pylar, parent company Elopak moved, about 2012, all manufacturing operations to Monchengladbach, Germany, from New Hudson, Michigan. Offices and spare parts warehousing were moved to 46944 Liberty Dr., Wixom from New Hudson. Hanrob, which manufactures self-piercing rivets, moved into this New Hudson building about July 2013. Elopak sold the New Hudson building to Hanrob, which obtained AQD permit (s) for its operations.

Conclusion:

Andersen & Associates, occupies the Wixom building since 1996, and is operating under Rules 281, 285 and 287 exemptions.

NAME

D. Hennehall

DATE

08/14/2017

SUPERVISOR

Joey

