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

N207045846

FACILITY: Complete Automation		**SRN / ID:** N2070
LOCATION: 1776 West Clarkston Road, LAKE ORION		**DISTRICT:** Southeast Michigan
CITY: LAKE ORION		**COUNTY:** OAKLAND
CONTACT: Jason Lewicki , EHS Coordinator		**ACTIVITY DATE:** 08/14/2018
STAFF: Adam Bognar	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** Minor
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On August 14, 2018, Michigan Department of Environmental Quality – Air Quality Division (MDEQ-AQD) Staff, I, Adam Bognar conducted an unannounced self-initiated inspection of Complete Automation, at 1776 Clarkston Road, Lake Orion, MI 48362. The purpose of the inspection was to determine the facility's 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); Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules; and Permit to Install No. 135-89.

Permit to install No. 135-89 was issued to "LRC Corporation" at this address in 1989 for a hot water wash system, methylene chloride cleaning tank, and a final rinse system. LRC corporation is no longer the occupant of this location. This inspection was conducted, in part, to find out if this permitted process still exists at this address. During this inspection I was able to verify that process equipment associated with Permit to Install No. 135-89 has been removed from this facility.

Complete Automation is the current occupant of 1776 Clarkston Road. I arrived at the facility at around 10 am. I met with Glen Jackson, Quality Manager, and Jason Lewicki, EHS Coordinator. I identified myself, provided credentials, and stated the purpose of the inspection. Mr. Jackson and Mr. Lewicki gave me a tour of the facility.

Complete Automation designs, fabricates, and assembles paint circulation systems for major automotive paint plants. These systems are responsible for getting the paint from the paint mix room to the booth. Customers include nearly all major automakers. Complete Automation began operating at this location approximately 30 years ago.

Attached to the main office building there is a warehouse where cylindrical cartridge filters are assembled. The assembly basically consists of cutting the appropriate filter material to the correct size, bending it into a cylindrical shape, then gluing the cylinder onto metal washer shaped discs that serve as a frame for the filter. This adhesive consists of a two-part epoxy consisting of an Isocyanate and Prepolymer (polyols). The isocyanate and prepolymer and stored in separate vessels until just before application. This epoxy mixture is applied to the circular metal filter frame and the cylindrical filter material is placed on top. The epoxy is allowed to cure at room temperature so that the frame and filter are adhered together. An employee working at this adhesive line stated that they use approximately 2 totes (approximately 275 gallon each) per month of both prepolymer and Isocyanate.

It does not appear that this adhesive process can qualify for any of the MDEQ-AQD permit exemptions. Rule 287 (2)(a) exempts adhesive lines from permitting if the adhesive use is less than two gallons per day and has emissions released only into the in-plant environment. Based on the

information I gathered during this inspection, the adhesive usage is likely closer to 1000 gallons per month (around 30 gallons per day). Operation of this adhesive application line is in violation of MDEQ-AQD Rule 201. Complete Automation must obtain a permit to install from the MDEQ-AQD for this adhesive application line. A violation notice was sent to Complete Automation on August 30, 2018 seeking compliance with Rule 201.

In a second warehouse there is one paint spray booth in operation. This booth is used to paint carbon steel parts that are used as scaffolding or framework for their stainless-steel vessels/equipment. Mainly water-based paints are used. The booths are equipped with dry filters. The filters were in place during my inspection. Filters are replaced as needed since booth use varies depending on the current project.

After the inspection, Mr. Lewicki provided me with paint purchase records (See attached). These purchase records indicate that from September 21, 2017 to August 22, 2018 the total paint purchased was 276 gallons including water. The paint booths at this facility appear to be exempt from Rule 201 requirements pursuant to Rule 287 (2)(c).

The paint storage area was clean and organized. Paint is stored in metal flame cabinets adjacent to the paint booth. Paints appear to be stored using good pollution prevention techniques.
Adjacent to the paint booth, there is one aqueous based parts washer used for paint gun cleaning. The air/vapor interface is approximately 2'x2'. The lid was closed during my inspection. Operating Procedures were not posed on the cold cleaner. I provided Mr. Lewicki with a "Cold Cleaner Operating Procedures" sticker and instructed him to post it on or near the cold cleaner per our regulations.

Mr. Lewicki provided me with the Safety Data Sheet for the parts washer solvent used (see attached). The cleaner is aqueous based and contains 55% by weight citric acid. Originally, I had assumed this parts cleaner utilized a VOC based d-limonene solution because of the tanks slight citrus odor. This cold cleaner appears to be exempt from Rule 201 requirements pursuant to Rule 281 (2)(k) as it is aqueous based.

In a third warehouse there is a fabrication shop. I observed that all of the machining operations were exhausted indoors. There are also various machining operations located throughout the three warehouses that were all exhausted indoors. These machining operations appear to be exempt from Rule 201 requirements pursuant to Rule 285 (2)(l)(vi). If any of these units were exhausted outdoors, our rules would require that a fabric filtration system be installed in order to qualify for a permit exemption.

Mr. Jackson stated that there are no boilers or emergency generators at this facility. Comfort heating is provided by natural gas fired space heaters that appear to be exempt from Rule 201 requirements pursuant to Rule 282 (2)(b)(i).

Compliance Determination

Complete Automation is not operating 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.
Complete Automation has installed and commenced operation of an unpermitted adhesive application line which uses more than two gallons per day of adhesive. A violation notice is scheduled to be delivered to Complete Automation on August 30, 2018 seeking compliance with Rule 201 requirements.

Process equipment associated with LRC corporation and Permit to Install No. 135-89 has been removed from this facility. An email was sent to MDEQ-AQD permit section on August 23, 2018 requesting to void Permit to Install No. 135-89.

NAME Adam Bogren DATE 8/30/2018 SUPERVISOR SK