

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

FY 2015 INSP

U6308010929431

FACILITY: Comau, Inc.	SRN / ID: U63080109
LOCATION: Comau Pico, Inc., Novi	DISTRICT: Southeast Michigan
CITY: Novi	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 05/07/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SOURCE CLASS:	
SUBJECT: FY 2015 inspection of Comau, Inc. ("Comau"), consisting of two companies namely Novi Industries (44000 Grand River Ave.) and Autotech (43900 Grand River Ave.)	
RESOLVED COMPLAINTS:	

U 63 08 0109 - SAR - 2015 05 07

Comau, Inc. (U-63-08-0109; MCDS Misc-1607)

Owned by FIAT

FKA Comau Pico, Inc.

Autotech (43900), Novi Industries (44000)

44000 Grand River Ave.

Novi, Michigan 48375-1119

Name change: Comau Pico, Inc. (FY 2012) → Comau, Inc.

Web: www.comau.com

PTI Exemptions: Rules 287(c) & 285 exempt equipment

On May 07, 2015, I conducted a level 2 self-initiated inspection of Comau, Inc. ("Comau"), consisting of two companies namely Novi Industries (44000 Grand River Ave.) and Autotech (43900 Grand River Ave.) housed in two adjacent buildings, located at 44000 Grand River Ave., Novi, Michigan 48375-1119. 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 inspection, Ms. Renee Smiljanic (Phone: 248-353-8888-ext. 6913; Fax: 248-358-2589; Mobile: 248-910-6613; E-mail: Renee.Smiljanic@comau.com), EHS Specialist, Mr. Matthew Payne (Phone: 248-353-8888-ext. 2865; Cell: 248-640-8402; E-mail: matthew.payne_2@comau.com), EHS Specialist, and Ms. Nehal Shah (Phone: 248-353-8888-ext. 2620), EHS Specialist, assisted me.

Mr. Mike Suter (Phone: 248-368-2865; Cell: 248-890-1060; E-mail: mikchael.suter@comau.com), Environmental Health and Safety Manager, separated from Comau about September 2012. Mr. Neal Saiz (Phone: 248-368-2302; Cell: 248-388-8249; E-mail: neal.saiz@comau.com), CSP, CHMM, Corp. Safety Manager, separated about September 2013.

Comau builds and assembles automotive assembly lines. There are tool building areas and assembly welding lines building areas. Integrated body welding systems, including robots, are designed, built, assembled and tested. Clients include FCA USA (Chrysler), GM, Ford, etc. There are two large paint spray booths: one at Novi Industries and another at Autotech.

Rule 336.287(c) paint booths (2).

Two paint spray booths with a dry filter system are present:

1. one 25 ft. x 20 ft. booth (40 ft stack, vertical discharge) at Autotech;
2. one 30 ft. x 50 ft. booth at (35 ft stack, vertical discharge) at Novi Industries.

The booths (2) are equipped with back-draft filters covering entire back surface. I asked Mr. Payne to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. I also asked him to keep the door closed (Novi Industries) so that particulate paint particles do not escape the booth through door unfiltered. Furthermore, keep the parts (as large as 5-30 ft. long) as close to the filters as possible so that overspray paint particles experience maximum capture velocity of the ventilation system.

Most painting is for touch-up of pre-painted parts; however, the parts (mostly large structural) are also painted. During the FY 2013 inspection, at Novi Industries, I noticed yellow paint marks on the floor outside the booth (and even some marks outside the building). I asked Comau to ensure that all painting is done inside the booth to avoid paint overspray nuisance painting of cars and trucks; i.e. property damage. During the FY 2015 inspection, the door was closed at Novi Industries.

During the FY 2015 inspection, I confirmed that both filter systems (2) were installed properly.

The booths are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c) provided the Rule's conditions are met (usage records < 200 gallons/ month, proper operation of the booths with dry filter systems; no painting outside the booths)

All paints are water based structural coatings containing approximately 50% water. I suggested to Comau to obtain a General Permit to Install for Coating Lines if business picks up and coating usage exceeds 200 gallons (excluding water) per month per booth. The coating usage records must be kept separately for each booth pursuant to Rule 287(c).

All coatings are water based and contain about 50% water. Solvent-based coatings are not used. PPG primer, topcoat paints are used (two primers, two topcoat paints, and one water-based aquathin paint thinner.).

MS Spreadsheet paint and thinner usage records are kept. I asked Comau to keep the usage records for each booth so that compliance with 336.287(c) limit of 200 gallons (excluding water) per month per booth can be readily determined. Approximately, 1,570 gallons / year at Autotech and 1,817 gallons / year at Novi Industries of paints were used in CY 2014. Coatings usages (with water) were higher than 200 gallons / month limit in some months (about 250 gallons / month). I asked Comau to apply "minus water factor" to the usages and create additional excel rows / columns to compute usages (200 gallons / month limit) on a water-free basis. It may be noted that coatings contain about 50% water. I asked Comau to obtain formulation data from coating suppliers as MSDS information is generally not accurate.

According the painter, Aquathin is predominantly used clean the paint spray guns, tools, etc.

Cold-cleaners

Cold-cleaners (parts washers) do not exist anymore; they were permanently removed about 2005.

Conclusion

Comau is in compliance with air quality regulations. I emphasized proper installation of the filters at all booths (2).

MCDS Misc-1607

NAME J. K. Narahalli

DATE 05/15/2015 SUPERVISOR

CJE

[Signature]