

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

U6308010935868

FACILITY: Comau, Inc.		SRN / ID: U63080109
LOCATION: Comau Pico, Inc., Novi		DISTRICT: Southeast Michigan
CITY: Novi		COUNTY: OAKLAND
CONTACT: Renee Smiljanic, Environmental Health and Safety Manager		ACTIVITY DATE: 08/02/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Determining compliance with 287		
RESOLVED COMPLAINTS:		

### Background

Comau LLC ID: U63080109 (Comau) is a Robotics Manufacturing facility located at 44000 Grand Ave, Novi Michigan. The manufacturing facility was inspected on Tuesday 8/2/2016 by Tyler Salamasick of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspecting was to determine compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. Comau currently operates under permit exemptions.

The site contact is the Environmental Health and Safety Manager, Renee Smiljanic. Matt Payne and two interns also joined in on both the inspection as well as reviewing records.

### Inspection

Site arrival was at 12:04pm Tuesday afternoon. Comau is located in a primarily industrial area with the nearest residential structure approximately 530 feet south west of the facility. Once on the property I was greeted by Renee Smiljanic. Upon meeting we reviewed the facilities paint usage as well discussed the permit exemption. Renee informed me that Comau has approximately 150 employees and operates from 6am until 2am the next day with a partial crew operating the later hours. Comau is a robotics factory that fabricates automotive manufacturing robots.

Comau has two paint booths. One located at the Novi industries building and the other located at the Autotech building. Permit exemption **R 336.1287 Permit to install exemptions; surface coating equipment** partially states...

Rule 287. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- (a) An adhesive coating line which has an application rate of less than 2 gallons per day and which has emissions that are released only into the general in-plant environment.
- (b) A surface coating process that uses only hand-held aerosol spray cans, including the puncturing and disposing of the spray cans.
- (c) A surface coating line if all of the following conditions are met:
  - (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
  - (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
  - (iii) 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.

Renee provided the AQD with paint records while on site. The records showed purchase history for Autotech and Novi industries (both booths) for 2015 and actual usage records (both booths) for 2016 (up to June). Renee explained that Iranna had informed her it was best to keep actual usage records for the permit exemption. The paint records indicate that the Novi industries booth averages approximately 20 gallons of paint

minus water per month and the Autotech booth uses approximately 5 gallons per month. No month comes close to the permit exemption. In 2015 the facility's highest paint minus water usage per month was in March which was 110 gallons of paint. Renee explained that this year's production is significantly lower than last year's. During the inspection I observed both filters on the paint booths. Both booth filters appeared to be in proper working condition. The booths also had magnehilic pressure drop gauges equipped. When the pressure gets too high they know to change the filters. I informed Renee that if they do predict a significant increase in production compared to 2015 they might want to look at getting a permit. As of the time of my inspection the booth maintenance as well as record keeping appear to satisfy the requirements of permit exemption **R 336.1287(c)**.

Comau also performs metal cutting, machining, grinding and drilling. Comau's Novi Campus has eight machining stations, four CNC machines as well as three large machines. The process can fall under permit exemption **R 336.1285(I)(vi)(B)**. Rule 285 states in part...

(I) The following equipment and any exhaust system or collector exclusively serving the equipment:

(i) Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals.

(ii) Die casting machines.

(iii) Equipment for surface preparation of metals by use of aqueous solutions, except for acid solutions.

(iv) Atmosphere generators used in connection with metal heat treating processes.

(v) Equipment used exclusively for sintering of glass or metals, but not exempting equipment used for sintering metal-bearing ores, metal scale, clay, flyash, or metal compounds.

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following:

(A) Equipment used on a nonproduction basis.

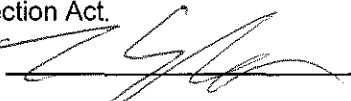
(B) Equipment has emissions that are released only into the general in-plant environment.

(C) Equipment has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

During my inspection I did not observe any metal operation that vented to the outside air. All equipment vented to the in plant environment. Comau appears to meet the permit exemption 285. If the facility would like to use the permit exemption while venting to the outside air they must follow part (vi)(C) as well as the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act.

Conclusion

It appears that they are in compliance with the Air Pollution Control, of the Natural Resources and Environmental Protection Act.

NAME 

DATE 8/8/16

SUPERVISOR CJE