

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

FY 2015 IIRB

U6312037929661

FACILITY: Comau, Inc.	SRN / ID: U63120379
LOCATION: 2800 West 14 Mile Road, Royal Oak	DISTRICT: Southeast Michigan
CITY: Royal Oak	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 05/14/2015
STAFF: Iranna Konanahalli <i>AK</i>	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 initiated inspection of Comau, Inc., Royal Oak	SOURCE CLASS:
RESOLVED COMPLAINTS:	

U 63 12 03 79 SAR 2015 05 14

Comau, Inc. (U-63-12-0379)

Owned by FIAT

FKA Comau Pico, Inc.

2800 West 14 Mile Road

Royal Oak, Michigan 48073-1764

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

Web: www.comau.com

Rules 285, 287

On May 14, 2015, I conducted a level 2 self-initiated inspection of Comau, Inc. ("Comau"), located at 2800 West 14 Mile Road, Royal Oak, Michigan 48073-1764. 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, Mr. Russ Miller (Cell: 248-521-9245; E-mail: Russ.Miller@comau.com), Manufacturing Supervisor, assisted me. Mr. Chris Czerkis (Cell: 248-640-8107; E-mail: Christopher.Czerkis@comau.com), EHS Specialist, was not present.

Mr. Mike Suter (Ph: 248-368-2865; Cell: 248-890-1060; E-mail: mikchael.suter@comau.com), Environmental Health and Safety Manager, separated from the company about 2012.

Comau designs, builds, tests and assembles automotive assembly lines for customers, e.g., FCA USA (Chrysler), GM, Ford, etc. About 2006, Comau closed manufacturing business at 2800 West 14 Mile Road building. The building was empty until 2010 when Comau restarted assembly line building operations at the same location (2800 West 14 Mile Road). 95 percent of business is for automotive assembly lines such as engines, transmissions, clutches, etc.

Rule 336.287(c) paint booth

One giant paint spray booth with a dry filter system at the back wall is present: one 30 ft. x 30 ft. booth. The booth is equipped with a back-draft filter system. I asked Mr. Miller to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. Although records are not kept, painter estimated paint usage to be about 75 gallons per month (including water). All paints are water based structural steel paints; no solvent based paint. All paints are air-dried; no bake oven. Predominantly, large structural parts (5-20 feet) are

painted.

During the FY 2015 inspection, I observed painting of structural parts in progress. Visible emissions of paint over-spray particles were moving towards the filters indicating adequate capture velocity. The filters were installed properly.

The 30 ft. x 30 ft. booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c).

Sandblast machine

One sandblast machine is present. The machine is equipped with Donaldson Cartridge Filter System (Donaldson Company, Inc., a Division of Torit, of Minneapolis, MN 5840) consisting of two cartridges. The machine is idle and is in disrepair needing significant repairs.

The sandblast machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

GM Metal removing line

A metal removing line for GM (6 machines) is present. Each machine is equipped with a mist collector.

Engine line

An engine line is being assembled. Parts are integrated into an assembly line. Upon completion of the assembly, the line will be disassembled and shipped to Trenton Engine Plant (Chrysler), where it will be reassembled.

Transmission line

One automotive transmission machining line for GM (Mexico) is being built.

Robots

Robots are built and tested.

Conveyor line

A conveyor line is assembled for GM, Tonawanda, NY. – Shipped.

Saw, cutting, welding machines

Structural steel is cut and steel is welding together. All welding is manual. There is no exhaust to outside ambient air. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

Boilers

Two natural gas fired boilers are present: Steam Pak Hot Water Boilers built in 1958. The boilers considered grand-fathered (<1967) pursuant to Rule 336.1201 (Permit-to-Install). Besides, the boilers are much less than 10 MM BTU per hour capacity.

Conclusion

Comau is in compliance with air quality regulations. I emphasized proper installation of the filters at the paint booth.

NAME J. L. Hennahall DATE 06/08/2015 SUPERVISOR CJE