

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

*FY 2015 Insp-*

P000228458

FACILITY: Tachi-S Engineering, USA Inc	SRN / ID: P0002
LOCATION: 23227 Commerce Dr., FARMINGTN HLS	DISTRICT: Southeast Michigan
CITY: FARMINGTN HLS	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 02/04/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of Tachi-S Engineering, USA, Inc. ("Tachi-S")	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

*P0002 - SAR - 2015 02 04*

**Tachi-S Engineering, USA Inc. (P0002)**  
23227 Commerce Dr.  
Farmington Hills, MI 48335-2705

About 1998, Tachi-S moved from 23880 Industrial Park Dr., Farmington Hills, MI 48335-2871 (N2034) to 23227 Commerce Dr., Farmington Hills, MI 48335-2705 (P0002). FIAMM Technologies, Inc. (N2034), America FIAMM, occupies that former space.

**PTI Nos. 5-89 (N2034; 23880 Industrial Park Dr.) for BDB-6 PAINT ARRESTOR BOOTH, voided on January 28, 2010, based upon Nov 29, 2009, inspection.**

On February 4, 2015, I conducted a level-2 self-initiated inspection of Tachi-S Engineering, USA, Inc. ("Tachi-S") (former SRN: N2034, current SRN: P0002), an automotive seating systems and services company, located at, 23227 Commerce Dr., Farmington Hills, MI 48335-2705. 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. Tom Kralik (Phone: 248-888-7200; Cell: 248-417-6426; E-mail: t.kralik@tachi-S.com), Testing Manager, Tachi-S, assisted me. , Mr. Roy Thorson (248-478-5050), HR Manager, was not present.

About 1998, Tachi-S moved its operations from 23880 Industrial Park Dr., Farmington Hills, MI 48335-2871 (SRN: N2034) to 23227 Commerce Dr., Farmington Hills, MI 48335-2705 (SRN: P0002)

Tachi-S performs engineering, prototyping, testing, etc. for automotive seating systems. Approximately five seats per year are built at this location; manufacturing takes place in Ohio. The non-production seats are made for testing, prototyping. Tailoring, cutting, gluing takes place. Patten development for automotive seating systems is performed.

The following engineering activities are conducted:

1. Testing: testing, validation, system certification
2. Prototyping: functional prototyping,, skiving, shaping foam, developing patterns from trim covers or digitizing and cutting materials

3. Engineering: powerful CAD and CAE systems to achieve structural integrity
4. Design: create stylish and visible beautiful seating systems incorporating safety, comfort, production efficiencies.

All of the above activities are for seat systems. Customers are Honda, Nissan, BMW, etc.

Seats:

1. Front seat backs
2. Front seat cushions
3. Rear seat backs
4. Rear seat cushions
5. Headrests
6. Armrests

Cutting systems include include fabric, vinyl, leather, plus pads, needle punch, stitch bond, tyvar, pattern paper, etc.

#### **One 6 ft. \* 6 ft. 6 ft. Paint Spray Booth (Rule 287(c))**

One 6 ft. H\* 6 ft. W\* 6 ft. D JBI Spray Booth Systems (Ossewo, WI 715-597-3168) paint spray booth with a back-draft dry filter system is present. Six filter panels are present at the back of the booth. Both spray guns and spray cans are used; these days, mostly spray cans. The booth is used sparingly in any given year.

There were holes in the filter system during FY2015 inspection. I asked Mr. Kralick to install the filters such that they fit, at all times, snugly without gaps and holes. . I also asked him to keep records of paint and solvent usage according to Rule 336.287(c).

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

Upon keeping usage records and operating the booth properly as designed and as intended, the coating booth meets all of the Rule 336.1287(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.

Side air-bag testing is done using sophisticated cameras.

PTI Nos. 5-89 associated with N2034 when Tachi-S was present at that previous location is voided on January 28, 20210, based upon November 12, 2009, inspection.

#### **Misc. Equipment (Rule 285(l))**

Pattern making area with cutting, sewing, stitching and gluing is present. Metal cutting equip., lathes, drill presses, saws, etc. are present. None has an exhaust to outside ambient air. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

#### **GrayMills Cold-cleaner 4 ft. \* 3 ft.**

One Gray Mills parts / cold-cleaners with spray a brush and a solvent tank is present. The cold-cleaners are subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(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.

One unit may be described as "soak and scrub tank" type with a brush. Mechanically assisted lid is present. The lid was closed during the inspection.

The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

During FY 2015 inspection, the operating procedures were not posted. On February 4, 2015, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice in the procedures.

The cold-cleaner is not serviced due to low usage.

Solvent: GrayMills Corp. Super Agiene 141 (Chicago)

100% VOC solvent (97% aliphatic hydrocarbons petroleum distillates). Flash Point (FP) = 145 °F Tag CC. Auto Ignition = NA °F. Boiling Point (BP) = 360-410 °F @ 760 mm Hg. Vapor Pressure (VP) = 23 mm Hg at 68 °F. Specific Gravity (SG, Water = 1.0) = 0.8. Density (ρ) @ 68 °F = 6.65 lbs. / gallon (0.8 kg / L). Flammability range = 0.9 %v (LEL) – 7%v (UEL).

#### **Conclusion:**

PTI Nos. 5-89 associated with N2034 when Tachi-S was present at that location is voided based upon November 2009 inspection. PTI (Rule 201) exempt process equipment (Rules 287, 285, 281, etc.)

NAME B. K. Kurnahall DATE 2/5/2015 SUPERVISOR CJE