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

P078038694

FACILITY: Durr Systems, Inc. - Southfield		**SRN / ID:** P0780
LOCATION: 26801 Northwestern Highway, SOUTHFIELD		**DISTRICT:** Southeast Michigan
CITY: SOUTHFIELD		**COUNTY:** OAKLAND
CONTACT: Scott R. Darnall , Senior Manager Corporate Safety		**ACTIVITY DATE:** 02/22/2017
STAFF: Sebastian Kallumkal	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** Minor
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, February 22, 2017, I conducted a self-initiated inspection at Durr Systems, Inc.- Paint and Final Assembly Systems located at 26801 Northwestern Highway, Southfield, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and to verify whether the facility needs to report its air pollutant emissions annually to MDEQ-AQD via Michigan Air Emissions Reporting system (MAERS).

I arrived at the facility about 9:00 AM. At the facility I met Scott R. Darnall, Senior Manager Corporate Safety. I introduced myself and stated the purpose of my visit.

During the pre-inspection meeting, he informed me that the building is primarily office space and a testing facility for the paint booth and spray guns that Durr manufactures elsewhere. Other companies also test their paints using Durr's spray guns and spray booths. The facility has two spray booths. He told me the monthly coating usage is less than 60 gallons. The facility coats small panels or parts of whole chassis to test the booth, the coating, or to test the sealer robots. The facility also has a natural gas fired (equipped with 2 heater boxes, 2.5 MMBTU/hr) cure ovens. The processes at the facility appears to be exempt from permit to install requirements pursuant to R336.1283(2)(v).

The building also houses ECO-CLEAN and Schenck which are subsidiaries of Durr Systems. ECO-CLEAN programs and tests conveyorized parts cleaners for their electronic and mechanics performances. No solvents are used in this process. Schenck tests balancing equipment and ships out.

Durr Systems has no parts washers at this facility. It has a natural gas fired (spark ignition), 153 HP, 125 KW, emergency generator, manufactured by Cummins Power Generation. This engine undergoes diagnostic tests once each week. Build Date: 10/2/2015. Startup = 12/18/2015.
Engine Model No.: FCEXB06.8GDB;
Generator Model No.: GGHJ-1527009; S. No.: J150886699
# of Starts: 76
Operating hours: 40.1
KW Hrs: 301
Cummins Bridgeway maintains the engine on an annual basis. I collected the PEM work order for 1/11/2017. I contacted Cummins (248 573 1900) regarding the EPA certificate. The tech rep (Joshua) indicated that the engine is certified and agreed to forward the EPA certificate to AQD.

I explained Mr. Darnall about the applicable requirements such as area MACT (40 CFR 63, Subpart ZZZZ) requirements and NSPS (40 CFR 60, Subpart JJJJ) for the emergency generators. He agreed to comply with the requirements. I informed him that they need to comply with the requirements of MACT and the NSPS for emergency generators. The engine

appears to be exempt from permit to install requirements pursuant to R336.1285 (2) (g) which states in part that:

R 336.1285 Permit to install exemptions; miscellaneous

Rule 285 (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.
(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:
(g) Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input.
The maintenance personnel indicated that the building has two roof units of 173,000 BTU/hr and 21 roof units of 435,000 BTU/hr for heating the building. Mr. Darnall send me that natural gas usage for the heating units. In 2016 the facility used about 9.022 MMCF of natural gas.

Durr Systems started the office at this location on January 4, 2016, but started the laboratory operations in May 2016. It operates only one shift and 5 days per week. It was about 320 employees.

After the pre-inspection meeting, he accompanied me for an inspection of the facility. We inspected the two buildings with R&D processes. The facility's operations appear to be exempt from permit to install requirements (Michigan Administrative Rule R336.1201) pursuant to R336.1283 (2) (v).

R 336.1283 Permit to install exemptions; testing and inspection equipment.

Rule 283. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.
(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:
(a) Pilot processes or pilot process equipment utilizing T-BACT used for any of the following:
(i) Chemical analysis.
(ii) Physical analysis.
(iii) Empirical research.
(iv) Theoretical research.
(v) The development of process or process equipment design and operating parameters.
(vi) The production of a product for field testing.
(vii) The production of a product for clinical testing of pharmaceuticals.
(viii) The production of a product for use as a raw material in the research and development of a different product.
(b) Laboratory equipment.
(c) Equipment used for hydraulic or hydrostatic testing.
(d) Equipment for the inspection of metal, wood, or plastic products.
(e) Vacuum pumps for the leak-testing of metal products using helium or nitrogen gas.
(f) Process sample valves used to collect material exclusively for testing and inspection.
(3) The pilot processes and pilot process equipment excluded from the requirement of R 336.1201(1) pursuant to the provisions of subrule (2)(a) of this rule do not include pilot processes or pilot process equipment used for any of the following:

(a) The production of a product for sale, unless such sale is only incidental to the use of the pilot process or pilot process equipment.
(b) The repetitive production of a product using the same process or process equipment design and operating parameters.
(c) The production of a product for market testing or market development
(d) The treatment or disposal of waste which is designated, by listing or specified characteristic, as hazardous under federal regulations or state rules.

Conclusion: The facility appears to be in compliance with applicable State air quality requirements. Compliance with requirements for the emergency engines was not verified at this time. Facility needs to comply with the requirements of 40 CFR 60, Subpart JJJJ for the emergency RICE. Facility is not required to report its air pollutant emissions to AQD.

NAME Sebastian Kallumkal DATE 3/16/17 SUPERVISOR Jayne Bl