

U-63-08-0109

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

FY2018 Insp-

U6308010942656

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: 11/14/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2018 inspection of Comau, Inc. ("Comau")		
RESOLVED COMPLAINTS:		

**Comau, Inc. (U-63-08-0109; MCDS Misc-1607)
Autotech (43900), Novi Industries (44000)
44000 Grand River Ave.
Novi, Michigan 48375-1119**

Name change: Comau Pico, Inc. (FY 2012) → Comau, Inc. Owned by FIAT S. p. A., now known as FCA Italy

Web: www.comau.com

PTI Exemptions: Rules 287(2)(c) & 285 exempt equipment

On November 14, 2017, I conducted a level-2 self-initiated **FY 2018 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, and Mr. Matthew Payne (Phone: 248-353-8888-ext. 2865; Cell: 248-640-8402; E-mail: Matthew.Payne_2@comau.com), 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. Ms. Nehal Shah (Phone: 248-353-8888-ext. 2620), EHS Specialist, separated about August 2017.

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 (44000 Grand River Ave.) and another at Autotech (43900 Grand River Ave.).

Rule 336.287(c) paint booths (2).

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

1. one 25 ft. W x 20 ft. D x 12 ft. H booth (40 ft. stack, vertical discharge) at Autotech (43900 Grand River Ave.);
2. one 30 ft. W x 50 ft. D x 20 ft. H booth at (35 ft. stack, vertical discharge) at Novi Industries (44000 Grand River Ave.).

The booths (2), open at the front, 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. In addition, I asked him use duct or painters tapes to cover holes / gaps, if any.

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 2018 inspection, the door was closed at Novi Industries.

During the FY 2018 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(2)(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(2)(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). PPG is the sole supplier. Only a fraction of paints purchased is used at this site and the rest is packaged for the customers' use.

CY 2014 coating usage

MS Spreadsheet paint and thinner usage records are kept. During FY 2015 inspection, I asked Comau to keep the usage records for each booth so that compliance with 336.287(2)(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.

CY 2016 coating usage

MS Spreadsheet paint and thinner usage records are kept. The modification to the MS Spreadsheet's calculations and records are made per my request during the previous inspection.

Approximately, based upon purchase records, 1,879 gallons (887 gallons without water) year at Autotech and 1,197 gallons (562 gallons without water) per year at Novi Industries of paints were used in CY 2016. However, of 1,879 and 1,197 gallons, only 171 gallons per year (CY2016) at Autotech and 124 gallons per year (CY2016) at Novi Industries were used and the rest was given to the customers for their use. Based upon my recommendations, Comau modified the spreadsheet to show accurate usages.

According the painter, Aquathin is predominantly used to 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). Improved coating usage records are kept per my request.

MCDS Misc-1607

NAME *D. McManis* DATE *12/12/2017* SUPERVISOR *Joyce*

