

U 63 15 10 437

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

FY2015 Insp

U63151043731425

FACILITY: Toyota Boshoku America, Inc.		SRN / ID: U631510437
LOCATION: 28000 West Park Dr.		DISTRICT: Southeast Michigan
CITY: Novi		COUNTY: OAKLAND
CONTACT: <i>76</i>		ACTIVITY DATE: 09/24/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2015 inspection of Toyota Boshoku		
RESOLVED COMPLAINTS:		

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Toyota Boshoku America, Inc. (U-63-15-10437)
28000 West Park Dr.
Novi, Michigan 48377-1386

Rules: 336.1285, 336.1287

On September 24, 2015, I conducted a level 2 self-initiated inspection of Toyota Boshoku ("Boshoku"), located at 28000 West Park Drive, Novi, Michigan 48377-1386. 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. Kristina Adkins (Phone: 248-295-6837; Cell: NA; Fax: 248-349-4535; E-mail: Kristina.Adkins@TBAmerica.com), HR/GA Analyst, Tech Center, Mr. Ken Peabody (Phone: 248-295-6481; Cell: 248-766-1753; Fax: 248-295-6482; E-mail: Ken.Peabody@TBAmerica.com), Sr. Manager, Evaluation Dept., Tech Center, Mr. Randy Craig (Phone: 248-295-6775; Cell: 248-924-1315; Fax: 248-449-8981; E-mail: Randy.Craig@TBAmerica.com), Prototype Quality / Manufacturing Manager, Tech Center, assisted me.

Concerning interior systems such as seat, door, trim, headliner, substrate, carpet, air & oil filters, engineering, R & D, testing, prototyping is accomplished in two (2) buildings:

1. Building 1: 28000 West Park Dr., Novi, Michigan – engineering, R & D, testing
2. Building 2: 45875 Dylan Dr., Novi, Michigan – prototyping

Building 1

Nine (9) environmental chambers are present. Concerning interior parts, the chambers are used to test parts for extreme temperatures (cold and hot). These chambers emit practically nil air contaminants. In addition, one materials analysis laboratory is present.

Building 2

Spot welding and mill welding machines are present. Two computer-controlled Gerber Cutters are present. The cutters cut fabric, leather, vinyl, etc. Tailoring machines are also present.

As all emissions are released to in-plant environment, the machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

Glue / adhesive booth

One solvent-based glue spray booth (8 ft. W x 4 ft. D * 4 ft. H) with a back-draft dry filter system is present. Glue / adhesive usage records are not kept; Mr. Craig stated that about 1-5 gallons of glue / adhesive

coatings per month was used. All are solvent based. Pleated filters are covered with cheese cloth, which is replaced once per day as needed. The cloth saves expensive pleated filters.

I asked Mr. Craig to install and inspect 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).

HVLP guns are used and are tested with test caps. All adhesives are solvent based. One oven is present that heats the parts to 65 °C for 3 minutes.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c). For adhesive coatings to Rule 336.287(a) with 2 gallons per day limit may also be used if proper booth is not present and the emissions are released only to in-plant environment. However, in this case exhaust gases are discharged to outside ambient air.

Upon keeping usage records, 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.

Conclusion

The machines / processes, adhesive booth are exempt from Rule 336.1201 pursuant to Rules 336.1285 and, 336.1287, respectively.

NAME R. Kenanahall

DATE 09/25/2015 SUPERVISOR CJE