U-63-15-10437

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
**ACTIVITY REPORT: Self Initiated Inspection** FY 2018 Insp-

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| **FACILITY:** Toyota Boshoku America, Inc. | | **SRN / ID:** U631510437 |
| **LOCATION:** 28000 West Park Dr., Novi | | **DISTRICT:** Southeast Michigan |
| **CITY:** Novi | | **COUNTY:** OAKLAND |
| **CONTACT:** | | **ACTIVITY DATE:** 11/16/2017 |
| **STAFF:** Iranna Konanahalli | **COMPLIANCE STATUS:** Compliance | **SOURCE CLASS:** |
| **SUBJECT:** FY 2018 inspection of Toyota Boshoku ("Boshoku") | | |
| **RESOLVED COMPLAINTS:** | | |

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

**Rules: 336.1285, 336.1287**

On November 16, 2017, I conducted a level 2 self-initiated **FY 2018 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, Mr. Thomas Mayer (Phone: 248-295-6817; Cell: 248-672-7120; Fax: 248-349-4535; E-mail: Tom.Mayer@tbAmerica.com), Lab Manager, Tech Center, and Mr. Randy Craig (Phone: 248-295-6775; Cell: 248-924-1315; Fax: 248-449-8981; E-mail: Randy.Craig@tbAmerica.com), Prototype Sr. Manager, Tech Center , assisted me.

Ms. Kristina Adkins (Phone: 248-295-6837; Cell: NA; Fax: 248-349-4535; E-mail: Kristina.Adkins@tbAmerica.com), HR/GA Analyst, Tech Center, separated about November 2015.

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, did not participate in the inspection.

Global Toyota Boshoku makes variety of products:

1. Filtration and powertrain: air, oil, transmission oil, cabin filters, intake manifolds, etc.

2. Interior components: seats, doors, molded headliners, floor carpets, instrument panels, etc.

3. Exterior components: bumpers, etc.

4. Textile products: air bags, seat belts, seat fabrics, etc.

At Novi, 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, 28000 West Park Dr., Novi**

Ten (10: one more added about 2016) environmental chambers (Nos. 1-10) are present: cold (-68 °C) and hot (80 °C); xenon / solar light; humidity; anechoic (NVH: Noise, Vibration, Harshness). 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, 45875 Dylan Dr., Novi**

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(2)(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; only intermittent use for prototyping (non-production). All adhesives are solvent-based at this time although water-based adhesives may be used depending on ongoing engineering and testing. Pleated filters (secondary) are covered with cheese cloth (primary), which is replaced once per day as needed. The cheese cloth saves expensive pleated filters. All adhesive use is for prototyping and not for production.

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(2)(c). This is non-production booth; used only for prototyping.

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(2)(c). For adhesive coatings, Rule 336.287(2)(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 filtration.

Upon keeping usage records (based upon purchase records, 30 gallons YTD-Jan-Oct-2017 << 200 gallons per month), the coating booth meets all of the Rule 336.1287(2)(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month. This booth is non-production, prototyping adhesive booth.

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 [signature] DATE 12/20/2017 SUPERVISOR [signature]