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

U63170162038959

FACILITY: Durr Systems, Inc.		SRN / ID: U631701620
LOCATION: 42445 West 10 Mile Road, Novi		DISTRICT: Southeast Michigan
CITY: Novi		COUNTY: OAKLAND
CONTACT: David Flynn , Manufacturing Manager		ACTIVITY DATE: 03/17/2017
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Friday, March 17, 2017, I conducted a self-initiated inspection at Durr Systems, Inc.-Paint and Final Assembly Systems located at 42445 West 10 Mile Road, Novi, 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.

I arrived at the facility about 11:00 AM. At the facility, I met Mr. David Flynn, Manufacturing Manager, and Mr. Phil Kowynia, Shop Superintendent. I identified and introduced myself and stated the purpose of my visit.

During the pre-inspection meeting, he informed me that the facility is a sheet metal welding shop to build big air pollution abatement systems and heater boxes. The facility has one paint booth, no emergency generator and no cold cleaner. Facility started its operations at this location in March 2016, operates two shifts, Monday through Friday, and has about 90 employees.

After the meeting, Mr. Flynn accompanied me for an inspection of the facility. The facility has about 60 welding machines, and one laser cutter. The emissions from the process are vented inside the general in-plant environment. These processes are exempt from permit to install requirements pursuant to Rule 285(2)(i) and R285(2)(l)(vi) respectively.

Next, we visited the paint booth. He explained that the booth was installed in July 2016. The booth is large. He told me that the doors are closed while painting. The booth has two set of filters. Each set of filters is replaced when the pressure differential is more 1" WC. He told me that the paint usage is very low. The submitted records show that the monthly paint usage is less than 200 gallons per month. The booth appears to be exempt from permit to install pursuant to Rule 287(2)(c).

R 336.1287- Permit to install exemptions; surface coating equipment.
(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:
(c) A surface coating line if all of the following conditions are met:
(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
(ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.
(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

On March 29th, I informed Mr. Scott Darnell, Senior Manager, Corporate Safety, by email, that if the paint usage is expected to be more than 200 gallons per month, they can apply for a permit

for the booth.

The facility also has a Regenerative Thermal Oxidizer (RTO) which is used to test paint blocks used in vapor concentrators. The paint vapors are introduced in to the concentrators, absorbed in to the test blocks, desorbed and exhausted through the RTO. The RTO is used infrequently such as once quarterly. The RTO appears to be exempt from permit to install requirements pursuant to R283(2)(a).

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

Conclusion: The facility appears to be in compliance with applicable State air quality requirements.

NAME Sebastian Kallenbach DATE 3/30/2017 SUPERVISOR Joyce