



# Case Study of Comefri, USA

## Keys to Success



**Project Description**



**Economic Value**



**Challenges & Advice**



**Benefits**



**Stewardship Meaning**



Operating a large manufacturing facility is an involved process with regulations that govern environmental, safety and health issues. Being able to ask for help in understanding what is required by law is useful, as Comefri, USA found. With a mission to be a worldwide leader in the development, manufacture and distribution of centrifugal fans designed for the ventilation market, Comefri, USA is a privately owned U.S. corporation that is part of the Comefri Group. The company supplies fans in more than 45 countries.

Comefri, USA's 120,000 square-foot facility in Hopkinsville was created in 2001, and expanded by 55,000 square feet in 2006. There are 85 employees.

In 2009, Comefri, USA contacted the Kentucky Division for Air Quality (DAQ) to discuss requirements of paint change in their process. During a later visit by DAQ, it was discovered that the facility had been operating since 2001 without

a required air permit. The facility's management team was unaware of the environmental regulatory requirements and later employed Dotty Graff as the Environmental, Health and Safety Coordinator. She began the process of determining the steps necessary to bring the business into compliance.

**“There is a wealth of knowledge in DCA. I have probably learned more from DCA than I would have from a college course.”**

The inspectors suggested Graff contact the Kentucky Department for Environmental Protection's Division of Compliance Assistance (DCA) for help in obtaining an air permit. They explained that DCA staff in the Environmental Compliance Assistance Program (ECAP) would

work with Graff to complete the necessary paperwork and answer any questions. Since Comefri, USA's management team was unaware and had no knowledge of the environmental regulatory requirements, they welcomed the assistance from DCA. With this guidance, Comefri, USA came into compliance with all air quality permitting requirements.

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[DCA.KY.GOV](http://DCA.KY.GOV)

800-926-8111



**\$** Since the discovery was made by a state inspector and the company did require an air permit, there was an automatic referral to the Division of Enforcement. Comefri, USA worked diligently with DCA staff to develop an air permit application and ensure understanding and compliance with permit terms and conditions. In this case, Comefri, USA's civil penalty was reduced by 50 percent.

**?** "One of the biggest challenges to contacting DCA was being unaware of its existence and services," says Graff. "We must understand that to be in regulatory compliance, much research may be required and having a resource to assist with understanding the regulations and how they apply to your specific process is a proven cost-effective means for compliance."



Comefri, USA's pretreatment wheel cleaning operation

Graff's advice is to contact DCA any time there are questions. Get the information you need to be in compliance. If you realize you've made an error, admit it and call DCA for assistance.

**+** Discovering that the plant had been operating without an air permit prompted Graff and other company officials to check other aspects in the facility that affect health, safety and environmental conditions.

"DCA staff taught me the necessary requirements for environmental compliance with our processes. They have taught me the data required for calculations specific to permitting reporting requirements, recordkeeping and modification requirements," states Graff. "I have probably learned more from DCA than I would have from a college course. They explained how things should be done and saved Comefri, USA a lot of money. It has been a rewarding experience for me to have learned so much from this organization. After gaining compliance, Comefri, USA went on to achieve ISO 14001 certification in 2011."

When there are questions, DCA is contacted for advice and



Wheel welding operation at the Hopkinsville facility

assistance, if needed to ensure compliance with air permits. All information is communicated to the management team. Comefri, USA is proud that DCA exists and is an excellent resource for businesses.

**🌿** "All of Comefri, USA's employees realize that having someone monitor environmental, health and safety issues is valid because everything we do has an effect on our process and the environment as a whole," says Graff. "DCA has made my job easier."

**HELPFUL HINT:** When you have questions or need help, take advantage of the free resources available to your business. Call ECAP at 800-926-8111.