

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B730543387

FACILITY: Jim Riehl's Friendly Automotive Group		SRN / ID: B7305
LOCATION: 32899 Van Dyke Avenue, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Bob Williams , Collision Center Manager		ACTIVITY DATE: 01/22/2018
STAFF: Lauren Magirl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: On-site Inspection		
RESOLVED COMPLAINTS:		

On Monday, January 22, 2018, I, Lauren Magirl and Francis Lim, Michigan Department of Environmental Quality-Air Quality Division inspectors, conducted an unannounced inspection at American Motors Realty Corporation, located at 32899 Van Dyke Ave., Warren, Michigan. The purpose of this inspection was to determine the compliance of American Motors Realty Corporation with Permit to Operate (PTO) No. 453-80 and the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules. When we arrived on-site, we observed that the building was now occupied by Jim Riehl's Friendly Automotive Group.

We arrived at the facility at about 1:30 pm and met with Mr. Bill Stanley, Service Department Director. He took us over to the collision center to meet with Mr. Bob Williams, Collision Center Manager. We identified ourselves, provided our credentials and stated the purpose of our inspection. He accompanied us for the inspections of the collision center paint booths. Jim Riehl's Friendly Automotive Group has one collision center that services the Warren and Clinton Township Locations. They have three spray booths in their collision center. One of the three booths was in operation during the inspection and I did not see any visible emissions coming from any of the booths. They record the number of hours the spray booths operate and the booths are serviced by a third party. The paint spray booths run Monday – Friday. We talked about Rule 287 exemptions for surface coating processes from permit to install requirements. I asked that the coating usage rate records to be kept going forward and reviewed the purchasing records. See the attached email for the records. The coating usage is under 200 gallons per month; therefore, they are exempt from a permit to install requirements. I ran the Potential to Emit (PTE) calculations for all three spray booths for coating Mid-Coat Adhesion Promoter as it has the worst case Hazardous Air Pollutants (HAP) concentration. The PTE for Toluene is 8.9 Ton/year which is less than Rule 211(1)(a)(i)(A) limit of Ten tons per year of any hazardous air pollutant that has been listed under section 112(b) of the clean air act. If the potential to emit (PTE) for a single HAP or aggregate HAPs increases above 10 ton/year or 25 ton/year, respectively, (major source of HAP emissions), the facility would be subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for coating processes codified under 40 CFR Part 63 and all major sources would require to obtain Clean Air Act Title V permit. If sources' PTE for HAPs reaches major source threshold, it may choose to obtain an opt out permit (synthetic minor permit) to limit source's HAP emissions. Below is the calculation for facility's PTE for a single HAP (Toluene):

Data from Coating Mid-Coat Adhesion Promoter SDS:

Toluene = 35% (wt%)

Density =7.09 lb/gal

Maximum usage under Rule 287(2)(c)(i) = 200 gallons per month X 3 booths x 12 months/year
= 7,200 gallon/year

PTE (Toluene) = (0.35 lb Toluene/lb coating) X (7.09 lb/gal) X (7,200 gal/year) X (1 ton/ 2000 lb)
= 8.9 ton Toluene/yr

Permit to Operate No. 453-80 was issued for the paint spray booth. The paint spray booth is no longer onsite. A request to void this permit was sent to AQD Permit Section (see attached email).

Conclusion:

Based on the inspection, Jim Riehl's Friendly Automotive Group appears to be in compliance with applicable air quality regulations. PTO No. 453-80 will be voided.

NAME Lauren Magiel

DATE 2/23/18

SUPERVISOR SK