DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

B894241186

FACILITY: BOB MAXEY LINCOLN MERCURY		SRN / ID: B8942
LOCATION: 16901 MACK AVENUE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Bob Powell , Body Shop Manager		ACTIVITY DATE: 07/14/2017
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Paint spray booth		
RESOLVED COMPLAINTS:		

SCHEDULED INSPECTION: THE BOB MAXEY LINCOLN MERCURY (BMLM)

SRN B8942

PERMIT #-Exempt Rule 287(2)(c)

16901 Mack Avenue, Detroit, MI 48224

Present: Bob Powell

Body Shop Manager

Terseer Hemben

MDEQ

Facility Phone: 313-885-4000

Background:

The Bob Maxey Lincoln Mercury (BMLM) operates a collision shop with 2 paint spray booth and body workshop at the dealership facility. The Company operated under the Wayne County permit# C-6043 until 2015 when the Company installed 2 new paint booths under applied exempt Rule 287(2)(c). The Wayne County permit is now void. The facility prepares automobile body part surfaces and paint sprays using a high transfer efficiency nozzle or equivalent. Painted parts are kept in the paint spray booth for curing. The booth has a down draft system lined with dry filters. The manager informed the operation is exempt from Rule 201(1) based on Rule 287(2)(c).

Inspection Narrative:

I arrived at the facility address on July 14, 2017 at 1050 hours. Purpose of the visit was to conduct a scheduled compliance inspection of the paint spray booth usage and metal surface polishing operation. Temperature at the hour was 77 F with wind speed 10 mph coming from the W, and humidity was 62%. I met Mr. Bob Powell, the Body Shop Manager, who welcomed my visit. We settled down to a pre-inspection interview. Mr. Powell informed nothing had changed at the facility with regards to operating conditions since last inspection conducted in 2015. We examined the equipment, stack, records, and concluded my visit with a post inspection conference. Mr. Powell sent copies of paint spray booth and maintenance records to AQD. Records are attached. I left the area at 1145 hours.

Process Description:

The BMLM is located on the property operating automobile dealership. The facility provides body repairs and paint touch up for vehicles that involve in minor collision or scratches. The paint booths have an indoor metal polishing attached as the work area. Particulates generated from the sanding/polishing operation fall into the work area. Regulatorily, this operation is exempt under Rule 285(2)(l)(vi)(B). Polished body parts are spray painted in the booth equipped with downdraft exhaust and dry filters. The dry filters are regularly replaced. This operation is exempt under Rule 287(2)(c). Records justifying the exempt status are attached.

Equipment Controls:

The controls for the spray booth operation are built in the equipment itself. For example, the high transfer efficiency quality of paint nozzle, the specifications on filters used for capturing, the draft pull capability and the auto control of booth built in for malfunction abatement add to an effective control of the system. Filters are regularly changed by a contracting company that replaces and disposes the

waste off-site. The water based paint reduces the contents of pollutants such as VOC and HAPs. The air exiting from filters is discharged to the ambient through the stack set to discharge at 35 feet from the gradient.

Compliance History:

There has not been any citizen complaint attributed to BMLM operations.

Regulatory Summary:

Permit # Exempt Rule 287(2)(c); Rule 285 (2)(l)(vi)(B) considerations:

Paint purchase records submitted for the months of October 2016 through July 2017 indicated the paint usage was less than 200 gallons per month. This validated the exempt status [Attachment A].

Rule 201 (1): The facility has not made any modification or change to the process or equipment since installation was completed consistent with Rule 201(1).

(b) The Sanding process takes place in the shop where particulates generated from the process are discharged in the work area. The sanding process is exempt per Rule 285 (2)(I)(vi)B.

Rule 301, 901 and Rule 910: the installation of paint spray booth with down draft filters operation and maintained in a satisfactory manner ensured compliance with the rules.

Rule 370 (1): This rule states in part: "Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner to minimize the introduction of contaminants to the outer air". BMLM maintains the filters by regular replacement and disposal in appropriate manner. Maintenance and filter replacement records are attached [Attachment Pg. B]

Opacity: There was no visible emissions from the operation of paint spray equipment at the time of inspection.

Compliance Determination:

The inspection of Bob Maxey Lincoln Mercury located at 16901 Mack Avenue, Detroit concluded the facility operated in compliance with air quality requirements.

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