

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

N228128553

FACILITY: CRANBROOK ACADEMY OF ART		SRN / ID: N2281
LOCATION: 500 LONE PINE RD, BLOOMFELD HLS		DISTRICT: Southeast Michigan
CITY: BLOOMFELD HLS		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 01/21/2015
STAFF: Joyce Zhu	COMPLIANCE STATUS: Pending	SOURCE CLASS: Minor
SUBJECT: Annual Inspection		
RESOLVED COMPLAINTS:		

On 1/21/2015, I conducted an annual inspection at Cranbrook Academy of Art, located on 500 Lone Pine Rd., Bloomfield Hills, Michigan. I arrived at the site around 10:40 AM. Meeting with Mr. Gene Hunt, the superintendent for Building Maintenance HVAC & Electric Services, I explained the purpose of inspection. Later, Mr. Al Beeman took me to see the paint spray booths.

#### Inspection:

There are five spray booths on campus. One is located in the design building; one, painting building; two, sculpture building; & one, which is under permit #660-89, is located in the maintenance building. During the inspection none of the booths was under operation. The booth in the design building had very clean filters although there were some dry paint spots inside the booth. All paints were stored in a fire-proof cabinet. In the painting department, I observed some overspray inside the booth. Paints were stored on the shelves outside of the booth. I didn't see any spill in the storage area. In the sculpture building, again, I saw some overspray inside the booths. Filters appeared to be cleaning. Outside of the booths, they posted a schedule of when they used the booths. According to the schedule, the booths were lastly used in 11/29/14. At the end, I inspected the booth in the maintenance building. There was some overspray inside the booth. Filters were replaced twice a year. Paints were stored either in a metal cabinet or on the shelves located inside the booth. I didn't see any spill in the storage area.

On Feb. 12, Cranbrook submitted the usage record for all the booths during fall 2014 to spring 2015. The record indicates that they used less than 10 gallons of coating during the period from each booth. It appears that the booths can be exempted from permit to install (PTI) according to Rule 287(c). However, assuming each booth could potentially use 200 gallons of coating (per Rule 287(c)), since there are five booths on site, & there is no legal enforceable limit to restrict the total VOC emissions from the facility, the facility could be potentially a major source. I have explained the scenario to Mr. Hunt & advised him to obtain an opt-out permit. Another issue that the facility needs to address is their consent orders. There are three active consent orders relating to asbestos removal in the late 90<sup>th</sup>. Mr. Hunt said they'd corrected the mistake. I advise him to contact Tammy Bell in the asbestos program to void the orders.

In conclusion, they operated the booth in the maintenance building in accordance to PTI # 660-89. Since they use very little paints in each of the booths (less than 50 gallons for all 5 booths from fall 2014 to spring 2015), I won't take any enforcement action against the company for now. I'll encourage the company to obtain an opt-out permit in order to avoid Title V obligations. I'll follow up with the company regarding to

the permit issue. If the company will not apply for the opt-out permit, nor will they submit a ROP (Renewable Operational Permit) application in the next few month, I'll send them a violation notice (VN).

NAME Joyce St

DATE 2/23/2015

SUPERVISOR CJE