

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

N258444285

FACILITY: Tottens Body Shop		SRN / ID: N2584
LOCATION: 1720 South Old US 27, GAYLORD		DISTRICT: Gaylord
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Tom Totten ,		ACTIVITY DATE: 04/27/2018
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled site inspection of true minor source. Facility has not maintained required records. Second visit will be conducted in following months to determine if proper recordkeeping has been implemented. sgl		
RESOLVED COMPLAINTS:		

On April 27, 2018, AQD District Staff arrived onsite to conduct a scheduled site inspection of the Totten's Body Shop, Inc. 1720 South Old 27, Gaylord, Otsego County, Michigan Facility (N2584). The referenced facility operates under Permit to Install (PTI) 705-90, issued on August 24, 1990.

Staff met with Tom Totten who provided a tour of the appropriate proportions of the facility and provided information regarding the facility and facility operations.

**FACILITY**

Located north of the intersection of South Old 27 and McCoy Road, the facility has been in operation for over 30 years, providing collision repair and custom painting services. Adjacent properties are primarily commercial, with some residential properties located less than one-tenth of a mile to the west of the facility.

The facility reports that with the exception of solvents, primers and clear coats they use Sikkens water-based coatings. An internet search of Sikkens products indicated that Sikkens is an international company and has developed a range of automotive coatings to meet European VOC requirements.

**PERMITTING**

As previously indicated, PTI 705-90 was issued on August 24, 1990. The permit was issued for a combined paint spray booth and Natural Gas (NG) fired drying oven.

At the time of permitting, the facility anticipated 50 gallons per month (600 gallons per year). In addition, permit emissions were based on a worst-case scenarios of 8.39 pounds VOC/gallon of coating, and an coating rate of approximately 0.5 gallon/hour.

Emissions estimated for operation of the drying oven by the permit engineer indicated de minimis volumes, and limits for drying oven activities were not included referenced permit.

**REGULATORY**

Based on Potential to Emit (PTE) calculations, the facility is considered a true minor.

Due to the nature of activities conducted onsite it appears that the facility MAY be subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Misc. Coating Operations (40 CFR Part 63, Subpart HHHHHH). At this time AQD has not received delegation for the subpart and compliance with respect to the NESHAP subpart has not been determined as part of the site inspection.

**EQUIPMENT**

At the time of the April 27, 2018 site inspection, the facility had two paint spray booths installed. One was permitted under permit 705-90, and the second was reported to be installed (unpermitted) a few years later.

Existing Rules include an exemption for both spray booths as well as sweet gas fired heaters, and are summarized below:

- Rule 287 (2)(c) Exempts a surface coating line if all of the following are met:
  - (i) No more than 200 gallons as applied, minus water, per month,
  - (ii) Any exhaust system that serves only the coating spray is supplied with a dry filter control or water wash control which is installed, maintained and operated in accordance with manufacturer's specifications, and
  - (iii) Monthly coating use records are maintained on file for the most recent 2-year period and available upon request.
- Rule 287 (2)(b) Exempts surface coating that uses only hand held aerosol spray cans .....or other coatings manually applied from containers not to exceed 8 ounces in size.
- Rule 285 (2)(hh) Exempts processes that use only hand-held aerosol spray cans.
- Rule 282 (2)(b)(i) exempts fuel burning equipment used for space heating, service water heating, .... Or indirect heating which only burns sweet natural gas with a heat capacity of not more than 50 million BTU/Hr.

Discussions with the facility indicated that both of the existing spray booths would meet exemption requirements should adequate material usage records be maintained.

### COMPLIANCE

A review of District Files failed to identify any complaints, or violations associated with the Facility.

Compliance status for the facility had been based on information provided during the April 27, 2018, site inspection. District Staff note that a supplemental visit will be required to determine monthly coatings usage at the facility.

**EMISSION LIMITS** – Emission limits for the permitted spray booth (installed in 1990) is limited to 4.2 lb/hr and 2.5 tons/year (Special condition (SC) 14). The lb/hr limit was based on the worst-case scenario of 8.39 lbs of VOC/gallon and a coating rate of approximately 0.5 gallon/hour. The 2.5 tons of VOC emissions was based on the 600 gallons of coating per year.

In addition, SC15 requires that no visible emissions (VEs) are emitted from the permitted booth. At the time of the April 27, 2018, site visit, the booths were not in operation, and VEs could not be verified at that time.

**OPERATION LIMITS** – The permittee is required by permit (SC 18) to operation of the permitted booth only when all exhaust filters are in place and operating properly. At the time of the April 27, 2018, site visit, an inspection of the paint booths indicated that the dry filters (ceiling mounted) had recently been replaced, and all appeared to be mounted properly. It should be noted that the facility reports the proper disposal of spent filters and waste paints and/or solvents by appropriate disposal contractors. Disposal records are maintained by the facility and are readily available for review.

The spray booths are equipped with high pressure low volume (HVLP) spray guns in compliance with SC 19.

**MATERIAL LIMITS** – Permit 705-90 contains no material limits, however SC 22 limits the applicant with respect to substitution of any fuels, paints and/or solvents that would result in a change in the quality or any appreciable increase in the quantity of emission of an air contaminant without prior notification and approval by the AQD. A review of various select Sikkens water-based coatings indicated a range of VOC contents from 4.26 lb/gallon to 5.7 lb/gallon. Which would appear to indicate that the changes in coatings would not result in an increase in VOC emissions.

**TESTING ACTIVITIES** – Under the referenced permit verification of the emission rates may be required prior to receiving operation approval (SC 16) however, no documentation of a written requirement for testing was found in District files, and the permit condition is not applicable at this time.

**MONITORING/RECORDKEEPING** – The permittee is required under the permit to keep monthly records of paint and solvent VOC content and usage amounts for a minimum of at least two years (SC 17). At the time of the April 27, 2018, site inspection Facility records were limited to inventory and purchase records. Discussions with facility staff indicated that they would initiate a monthly record of VOC content and usage to meet the requirement and provide information that can be used by the facility to determine if they meet permit limits and/or exemption requirements.

**SUMMARY**

On April 27, 2018, AQD District Staff arrived onsite to conduct a scheduled site inspection of the Totten's Body Shop, Inc. 1720 South Old 27, Gaylord, Otsego County, Michigan Facility (N2584). The referenced facility operates under Permit to Install (PTI) 705-90, issued on August 24, 1990.

Staff met with Tom Totten who provided a tour of the appropriate proportions of the facility and provided information regarding the facility and facility operations.

At the time of the April 27, 2018 site inspection, the facility had two paint spray booths installed. One was permitted under permit 705-90, and the second was reported to be installed (unpermitted) a few years later. Existing Rules include exemptions to permitting for both spray booths as well as sweet gas fired heaters. The only compliance issues noted at the time of the April 27, 2018, site inspection was failure of the facility to keep monthly VOC emissions and coating usage records as required under SC17. Notified of the compliance issue, the facility has indicated that it will initiate appropriate recordkeeping activities. District staff will conduct a follow up visit before fall to determine if record keeping has been initiated. If not initiated a Violation Notice will be issued.

NAME Sharon LeBlanc

DATE 5/3/2019

SUPERVISOR SN