

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

N378367242

<b>FACILITY:</b> Richardson of Gladwin		<b>SRN / ID:</b> N3783
<b>LOCATION:</b> 1100 W CEDAR AVE, GLADWIN		<b>DISTRICT:</b> Bay City
<b>CITY:</b> GLADWIN		<b>COUNTY:</b> GLADWIN
<b>CONTACT:</b> Mike Droptiny , Body Shop Manager		<b>ACTIVITY DATE:</b> 04/27/2023
<b>STAFF:</b> Nathanael Gentle	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled Onsite Inspection FY23		
<b>RESOLVED COMPLAINTS:</b>		

On April 27, 2023, AQD staff conducted a scheduled onsite inspection at Richardson of Gladwin Body Shop, SRN N3783. Staff arrived onsite at 10 AM and departed at 10:30 AM. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment Great Lakes and Energy, Air Quality Division (AQD) Administrative Rules; and to evaluate compliance with Permit to Install (PTI) No. 690-92. AQD staff were assisted onsite by Body Shop Manager, Mr. Mike Droptiny. At the time of inspection, the facility appeared to be operating in compliance.

## Facility Description and History

Richardson of Gladwin Body Shop is located at 1100 W Cedar Ave, Gladwin, MI 48624. The facility is located on the north side of M-61 between M-18 and Hill St. The surrounding area is comprised of a mixture of commercial and residential. The facility performs body work repair on a variety of automobile makes and models.

The facility was previously owned and operated as Graff Motor Sales. Onsite staff report Richardson acquired ownership and operation of the facility in April 2019. One Permit to Install (PTI) is associated with the facility, PTI No. 690-92. The permit was issued to Graff Motor Sales in 1993 for a paint spray booth. The previously permitted paint booth was removed from the facility and replaced with a new paint booth prior to sale of the facility to Richardson. Staff approximate the permitted paint booth was removed from the facility and replaced with a new coating booth in 2018.

Richardson of Gladwin is a minor source of regulated air pollutants. No complaints are on file for the facility. The facility was last inspected in July 2011. At the time of the 2011 inspection, the facility was found to be in compliance.

## Compliance Evaluation

### PTI No. 690-92

Permit to Install No. 690-92 was issued in 1993 to Graff Motor Sales, the former owner of the facility. The permit was issued for a paint spray booth and its associated controls. Onsite staff report the paint booth was removed from the facility sometime in 2018 and replaced with a new paint booth. The removal of the permitted paint booth and installation of the new paint booth was conducted prior to acquisition of the facility by Richardson. AQD staff visually verified the

paint booth associated with PTI No. 690-92 was no longer onsite. Due to the removal of the paint booth, it is recommended that PTI No. 690-92 be voided.

### **Coating Activities**

Coating activities conducted onsite primarily consist of parts coating in the paint booth. Installed in 2018, the paint booth is a Global Finishing Solutions XD. Coating activities conducted appear to meet the requirements of PTI exemption Rule 336.1287(2)(c). The paint booth is equipped with ceiling filters as well as bag filters prior to the stack. Staff report filters are changed at least once every 6 months. The paint booth is equipped with a series of sensors to alert staff if filters need to be changed. Additionally, an internal timer tracks the length of time that has passed since a filter was last changed. If a filter needs to be changed the paint booth will signal.

The facility utilizes a PPG water-based paint system. With the usage of water-based paint, solvent mixing is not necessary. As part of the PPG system, the facility maintains an inventory of select paints and colors. Paint is hand mixed for each work order. A software database is used to calculate the amount and color of each of the individual paints to be mixed to yield the desired color and volume for each paint job. Inventory of the individual colors are maintained, and the systems tracks when new paint needs to be ordered.

Paint usage records are maintained in the form of purchase records. AQD staff reviewed paint purchase records for February 2023 and March 2023. During the month of February 2023, the facility purchased a total of 7.6 gallons of paint. In March 2023 a total of 13.5 gallons of paint was purchased. As part of the requirements for exemption R287(2)(c), the coating use rate shall not be more than 200 gallons, as applied, minus water, per month. Based on the purchase records reviewed, the facility usage is well below 200 gallons per month. Additionally, as previously mentioned, the facility uses water-based paint. Information regarding the requirements of exemption R287(2)(c) was provided to the facility during the inspection as well as via email following the inspection.

In addition to the paint booth, the body shop is equipped with two prep decks. Each prep deck is equipped with an overhead hood equipped with filters. Staff reported the prep decks are rarely used for coating activities. The paint booth provides a better controlled environment which yields a higher quality coating application.

As an area source, the facility is potentially subject to the requirements of 40 CFR Part 63 Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. At this time, the State of Michigan does not have delegated authority over this rule and therefore AQD staff did not evaluate compliance with the rule while onsite. Facility staff were made aware of the rule and were encouraged review subjectivity to ensure compliance. Additional information regarding the rule was provided to facility via email following the inspection.

### **Summary**

Richardson of Gladwin Body Shop performs body work repair on a variety of automobile makes and models. Located at 1100 W Cedar Ave, Gladwin, MI 48624, the facility is a minor source of regulated air pollutants. One Permit to Install (PTI) is associated with the facility, PTI No. 690-92,

for a coating booth that is no longer located at the facility. Current coating operations conducted at the facility appear to meet the requirements of exemption Rule 287(2)(c). At the time of inspection, the facility appeared to be operating in compliance.

NAME Mathewson, Scott

DATE 5/1/2023

SUPERVISOR Chris Lane