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

N378959514

| | | |
|---|---|---|
| **FACILITY:** JOSEPH LUNGHAMER CHEVROLET INC | | **SRN / ID:** N3789 |
| **LOCATION:** 475 SUMMIT DR, WATERFORD | | **DISTRICT:** Warren |
| **CITY:** WATERFORD | | **COUNTY:** OAKLAND |
| **CONTACT:** DJ Hinman , Body Shop Manager | | **ACTIVITY DATE:** 08/26/2021 |
| **STAFF:** Kaitlyn Leffert | **COMPLIANCE STATUS:** Compliance | **SOURCE CLASS:** SM OPT OUT |
| **SUBJECT:** FY2021 Inspection | | |
| **RESOLVED COMPLAINTS:** | | |

**On August 26, 2021, I conducted a scheduled inspection of Joseph Lunghamer Chevrolet, located at 475 Summit Drive, Waterford Township, MI. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and Permit to Install (PTI) No. 26-92A.**

**Joseph Lunghamer Chevy is a car dealership with associated body shop. The facility has a permit to operate two coating booths and four prep stations in the body shop. The permit limits emissions of volatile organic compounds to 2,000 lbs/month and 8.9 tons per year, as determined on a 12-month rolling time frame.**

**I arrived at the body shop, introduced myself, and explained the purpose of my visit. I met D.J Hinman, Body Shop Manager. He was aware of the air quality permit. During this initial meeting, Mr. Hinman stated that he was not sure why the facility continued to need permit, considering the relatively low coating usage and low emissions from the facility.**

**Mr. Hinman led me back to the area where the coating booths and prep stations are located. One of the booths had the exterior of a vehicle in it, which had recently been coated and was now drying. The other coating booth was empty. Both of the coating booths had filters properly installed. The filters are changed on a regular basis, approximately every 6-7 weeks. The facility uses water-based paints and air dries the vehicles in the booths.**

**In between the two coating booths is a small room where paints are stored and mixed. This room also contained a drum where the waste paints are kept. The waste container appeared to be a standard 55-gallon drum. Mr. Hinman informed me that they dispose of wastes in the container and once it is full, it is picked up by a third party for proper disposal. The waste container is typically collected about once per year, since that is the typical amount of time it takes to fill up the container. I noted that the waste container and the paint containers were all stored with closed lids. In addition, this room also houses a small cold cleaner, which was used for cleaning the spray gun heads. There were DEQ Operating Instructions clearly posted on the cold cleaner and the lid was closed.**

**The four prep stations were parking spot sized spaces, where whole vehicles or parts of vehicles can be placed and then wiped down and primed prior to going in the coating booth. According to Mr. Hinman, primer is occasionally used to prep vehicles, but is not used on every job. The prep stations vent to the general in plant environment.**

**PTI No. 26-92A requires that records be maintained of the gallons of coating used and VOC mass emissions calculations on a monthly basis, as well as 12-month rolling VOC emissions calculations (EUCOATING S.C. VI.3). Following the inspection of the paint booth area, I collected records of coating usage and VOC emission calculations. The coating usage is tracked digitally, and a contractor from BASF comes out to compile coating usage records and calculate emissions. The coating usage and emissions calculations were provided for all of 2020. Records for 2021 have not yet been compiled and this typically only done on an annual basis, around emissions reporting time.**

**Coating usage and VOC emissions from the provided records are summarized in the table below. Coating usage includes all applications of primers, basecoat, topcoat, and specialty coatings. Most of the coating usage and the majority of VOC emissions came from basecoat application. The highest quarterly coating usage and VOC emissions were during the period from December 2019 to February 2020, with 32.99 gallons of coating usage and 52.17 pounds of VOC emissions. These quantities are well below the permit limits of 2,000 pounds per month. Total VOC emissions for the period of December 2019 through November 2020 were 159.31 pounds, or 0.08 tons, which is again well below the permitted amount of 8.9 tons per year. The facility did not provide 12-month rolling VOC emissions calculations.**

| Months Covered | Coating Usage (gal) | VOC Emissions (lbs) |
|---|---|---|
| December 2019 through February 2020 | 32.99 | 52.17 |
| March to May 2020 | 15.53 | 21.48 |
| June to August 2020 | 28.93 | 40.56 |
| September to November 2020 | 32.72 | 45.10 |

**Ongoing Need for a Permit**

**During the inspection, Mr. Hinman expressed that he was not sure why the facility continued to need permit, considering the relatively low coating usage and low emissions from the facility. However, due to the operation of two coating booths, the potential to emit from the facility exceeds the major source thresholds for hazardous air pollutants. Therefore, the facility does not qualify for exemptions from the requirement to obtain a PTI and continues to need a permit to operate both coating booths. Following the inspection, I followed up with the facility to explain the ongoing need for the permit.**

**Conclusion**

**Based on my inspection of the facility and review of the provided emissions calculation records, Joseph Lunghamer Chevy appears to be operating in compliance with the conditions of PTI No. 26 -92A and all applicable air quality rules and regulations.**

NAME Kaitlyn Leffler DATE 09/30/2021 SUPERVISOR K. Kelly