

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

N560066539

FACILITY: Collision Craftsmen		SRN / ID: N5600
LOCATION: 14080 23 MILE RD, SHELBY TWP		DISTRICT: Warren
CITY: SHELBY TWP		COUNTY: MACOMB
CONTACT: Marco Grossi , Owner		ACTIVITY DATE: 03/01/2023
STAFF: Robert Joseph	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection auto-collision repair shop		
RESOLVED COMPLAINTS:		

On March 1, 2023, I, Michigan Department Environment, Great Lakes, and Energy-Air Quality Division staff, Robert Joseph, conducted a scheduled inspection of Collision Craftsmen (also referred to as "the facility") located at 14080 23 Mile Road, Shelby Township, MI, 48315. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air, Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and the Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and conditions of the facility's General Coating Lines Permit to Install (PTI) 148-06.

General Facility Information

I arrived at the facility shortly after 1 p.m. and was introduced to Marco Grossi, facility owner. I stated my name, the purpose of my visit as a civil service AQD employee of the state, and presented my credentials. I asked Marco to provide me some background information regarding the facility. He stated the facility is an auto-repair collision and glass replacement shop that has been at this location for approximately four years. He stated the facility is open weekdays til around 5 p.m. and there are approximately 10 employees on staff. The facility is bound by the conditions of their General Permit and it is classified as a synthetic minor source with a coating and source-wide limit on VOCs.

I asked Marco if he was familiar with the facility's permit and its requirements. He stated that he was familiar with it and that he was informed by previous AQD staff that the permit would no longer be applicable to the facility. I informed him that was incorrect and that the facility is bound by the permit's operational and recordkeeping requirements. I then requested that Marco provide me a tour of the facility.

Facility Tour

The facility has two downdraft coating booths that are used to coat automobiles or automotive parts. The coating is performed using spray guns which Marco stated are high volume low pressure spray guns. These spray guns use large volumes of air to direct and move the coating application converting them into small droplets - allowing the coating to impact the surface of the object at a controlled and gentle pace. The booths are fitted with exhaust filters along the top where air enters and exits within the filters located on the sides of the booths. The magnahelic gauge measured under 1 lb/in² on both paint booths. Marco stated the filters are replaced anywhere from two to four weeks.

The facility does not perform sandblasting according to Marco, but rather performs this process through the use of mechanical tools such as an orbiter. In addition, the facility maintains a dust collector indoors to minimize the fugitive dust within the working areas.

Both processes are exempt from a permit to install since emissions are released into the general plant environment per Rule 285(l)(vi)(B).

I viewed the paint mixing room where the facility mixes paints and cleans the equipment with lacquer thinner. The lacquer thinner is emptied into a 55-gallon drum for disposal. I informed Marco to ensure that staff maintains the drum lid closed at all times when not in use. The cold cleaner due to its small area (less than 10 ft²) is exempt from a permit to install per Rule 281(2)(h).

Once the paints are mixed, they are placed on a scale which provides the following data per the software: amount sprayed (gal), actual VOC applied (lbs/gallons), regulatory VOC applied less water and exempt solvents, and the VOC emissions. Marco indicated that this information is generated from the coatings' SDS. Marco indicated that this is used to submit the facility's MAERS report. When I informed Marco regarding the additional records required per the facility's permit, he stated he was unaware of this.

Marco then ask me to join him in a conference call with his paint supplier, Kim Moore. Kim visits the facility often to ensure the software is operating properly for the paint mixer and scale. Kim indicated that the records are properly maintained via the software. I informed both Marco and Kim that the records are unsatisfactory and they do not provide the noted materials being used nor the VOC content in each output mix. Marco acknowledged that the facility also has not been recording the clean-up materials used, but rather only documenting the amount of 55-gallons that are disposed of.

I informed both Marco and Kim that the permit recordkeeping requirements must be maintained using Appendix B of the permit given the lack of information provided in the facility's software records used for their MAERS submittal. Marco and Kim were informed that the information provided would be reviewed followed by guidance regarding the recordkeeping. The facility was informed the next business day that a violation notice would be issued for failing to maintain satisfactory records as well as failing to maintain the monthly clean-up material (lacquer thinner) usage.

PTI 148-06

Attachment A - General Conditions

There were no concerns regarding these conditions at the facility. No visible emissions were observed, no malfunctioning equipment, and no obvious modification of the facility's equipment was observed.

FG - COATING

I. EMISSION LIMITS

Pollutant	Limit	Emissions
VOC	2000 lbs/month	< 90 lbs/month
VOC	10 tons/yr	< 1 tons/yr

Based on the facility's software program which is used to generate the facility's MAERS and purchase order records, the facility appears to be emitting less than 100 lbs/month (approximately 90 lbs/month) of VOCs through their coating operations, and under 1 ton/year (approximately 0.5 tons/yr). The facility did not maintain the amount of clean-up

material used (lacquer thinner), however, this usage along with purchase records do not cause the facility to exceed the permit limits.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility disposes of the clean-up materials and waste coatings into a 55-gallon drum. The facility was reminded to maintain the lid closed at all times when not in use as it was observed partially open during inspection.

IV. DESIGN/EQUIPMENT PARAMETERS

The facility's coating applicators are HVLP operated. Pressure caps were made available but not tested. The facility utilizes dry exhaust filters in the coating booths and there are no oxidizers on site (thermal nor catalytic).

V. TESTING/SAMPLING

The AQD has not requested that the facility conduct a performance test for verification of VOC content or emissions using an EPA approved method.

VI. MONITORING/RECORDKEEPING

The facility does not utilize an oxidizer (thermal nor catalytic). The facility maintains purchase orders. Purchase orders reveal the coating materials, clean-up materials, and coating preparation materials. The facility did not maintain monthly records of the VOC content or the gallons of each coating or clean-up material used, but rather it was documented daily and yearly instead. Daily records reveal usage varying up to 10 lbs a day. The facility was instructed to maintain monthly records also.

The facility also did not calculate the VOC emission calculations on a monthly or 12-month rolling basis for coating or clean-up materials used. The 2022 total per their MAERS submittal reveals slightly greater than 200 gallons used and almost 1,000 lbs of VOC emitted for the year. The facility was instructed to maintain both records for monthly and 12-month rolling totals.

The facility appears to maintain the SDS literature for each material used. The facility was informed to properly document the information from a material's SDS.

VIII. STACK/VENT RESTRICTIONS

There were no concerns observed with the facility's stack.

IX. OTHER REQUIREMENTS

The facility indicated that equipment has not been replaced or modified since operations began.

FG - SOURCE

I. EMISSION LIMITS

Pollutant	Limit	Emissions
VOC	30 tons/yr	< 1 ton/yr

VI. MONITORING/RECORDKEEPING

The facility did not calculate the VOC emission calculations on a monthly or 12-month rolling basis for coating or clean-up materials used. The facility provided records for daily usage, however, the materials used were not properly identified. These records indicate the facility averages approximately 0.04 tons per month and just under 1 ton per year of VOC emissions.

Appendix B

The facility was advised to complete Appendix B (in-conjugation with their software recordkeeping if they prefer) to ensure proper documentation and recordkeeping of the materials used.

Conclusion

A violation notice has been issued to the facility for not recording the monthly clean-up materials used - as well as the monthly and 12-month rolling VOC emission rates for both coatings and clean-up materials used. The facility has been instructed to submit these records monthly to the AQD for the remainder of 2022 to ensure proper documentation and recordkeeping are being maintained.

NAME Robert Joseph

DATE 03-21-23

SUPERVISOR Joyce