

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

N789654620

FACILITY: PREMIER FINISHES LLC		SRN / ID: N7896
LOCATION: 28060 GROESBECK HWY, ROSEVILLE		DISTRICT: Southeast Michigan
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Brian Borowski , Partner		ACTIVITY DATE: 08/07/2020
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On August 30, 2019, September 13, 20, and 27, 2019, October 16, 2019, and August 7, 2020, I conducted unannounced inspections of Premier Finishes, LLC, located at 28060 Groesbeck Highway, Roseville, Michigan. This facility has been assigned the State Registration Number (SRN) of N7896. The purpose of these inspections was to determine the facility's compliance with the requirements of 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; Permit to Install No. 36-18; and Consent Order AQD No. 2019-05.

Premier Finishes, LLC (Premier Finishes) is an automotive repair, finishing and detailing facility.

HISTORY

In 2007, Premier Finishes was initially brought to the attention of the AQD through an anonymous complaint regarding fallout. Per an on-site inspection, I determined that Premier Finishes was not keeping the coating use records required to demonstrate compliance with the R 336.1287(2)(c) exemption from R 336.1201(1) for operating surface coating lines, and did not install the emission controls required to qualify for the R 336.1285(2)(I)(vi) exemption from R 336.1201(1) for operating a grit blasting emission unit.

In 2010, administrative consent order (ACO) AQD No. 4-2010 was signed by Premier Finished and the Department. Upon subsequent inspections, by the AQD it was determined that Premier Finishes was operating in violation of ACO AQD No. 4-2010 for failing to maintain the grit blasting room exhaust particulate control device. I also determined that Premier Finishes failed to keep and maintain the coating use records to demonstrate compliance with the R 336.1287(2)(c) exemption from the R 336.1201(1) requirement to obtain an approved air use Permit to Install (PTI).

GRIT BLASTING PROCESS

On March 21, 2017, the AQD issued a violation notice for failing to maintain an appropriately designed and operated fabric filter collector for the grit blasting process as required per ACO AQD No. 4-2010.

On November 13, 2018, I conducted an on-site inspection and determined that the grit blasting process had been dismantled and rendered inoperative.

SURFACE COATING LINES

on April 17, 2018, the AQD issued a violation notice for failure to obtain an approved PTI because Premier Finishes failed to keep monthly records of coating use, which are required to demonstrate compliance with the R 336.1287(2)(c) exemption from R 336.1201(1).

On July 3, 2018, PTI No. 36-18 was approved by the Department for the operation of two Blowtherm downdraft spray booths. In 2019, ACO AQD No. 2019-05 was signed by Premier Finished and the Department.

RECENT INSPECTIONS

During each inspection I conducted on August 30, 2019, September 13, 2019, September 20, 2019, September 27, 2019, October 16, 2019, and August 7, 2020, I observed that Premier Finished had failed to maintain and operate the air cleaning device in a satisfactory manner. Specifically, I observed that the damper controls on the double-wide, north, spray booth in FGBOOTHs had not been maintained, and the gratings that cover the floor-mounted particulate filter control device was almost completely clogged (see attached photos) with a nonporous material that Mr. Borowski stated was Rhinocoat. Per Mr. Borowski, Premier Finishes had discontinued applying Rhinocoat more than a year ago. It appears that

Premier Finishes failed to maintain the particulate control system in a satisfactory manner, which is a violation of PTI No. 36-18 FGBOOTHs IV.1, and ACO AQD No. 9.A.1.

On August 7, 2020, I inspected the single-wide, south, spray booth in FGBOOTHs, and I observed that the particulate filter was not properly installed, which caused an approximate 1-inch gap at the west end of the filter frame. This appears to be a violation of PTI No. 36-18 FGBOOTHs IV.1, and ACO AQD No. 9.A.1.

REPORTING

Per the MACES (Michigan Air Compliance and Enforcement System) record on January 21, 2020, I entered the following comment, "Monthly paint and cleaning solvent log. The company has not submitted reports on a monthly basis for the first 12 months since permit issuance. PTI No. 36-18 was issued on July 3, 2018. The company began submitting consecutive monthly reports beginning with the March 2019 paint log (submitted April 2019) and continued to submit monthly paint logs through September 2019 (submitted October 16, 2019). The October, November, and December paint logs were submitted on January 21, 2020. Therefore, per PTI No. 36-18, FGBOOTHs, VII.1. "If at any time the reporting/recordkeeping is found to be unsatisfactory or is not submitted within the required timeframe, the AQD may require the permittee to submit monthly reports for a minimum of 12 months and then resume 6-month reporting if the monthly reports are deemed satisfactory." Therefore, the AQD will require the Permittee to continue to submit monthly reports until the permittee satisfies the continual monthly reporting requirement for 12- months.

On February 2, 2020, I sent the following email message to brenda.premier2011@yahoo.com and bb.premierfinishes@yahoo.com,
"Hi Brian and Brenda,

Per PTI No. 36-18, FGBOOTHs, VII.1, please continue to submit monthly paint and cleaning solvent logs through December 2020.

As always, please feel free to contact me if you have any questions.

Regards,

Bob"

During the inspection I conducted on August 7, 2020, I informed Mr. Borowski that the AQD had not received a paint log since February 2020. The failure to provide the required monthly reports appears to be a violation of PTI No. 36-18 FGBOOTHs VII.1, and ACO AQD No. 9.C.1.
[SEE PG 3 OF AQD No. 2019-05]

CONCLUSION

It appears that Premier Finishes, LLC operated FGBOOTHs while all respective exhaust filters were not installed, maintained and operated in a satisfactory manner. Furthermore, the dampers that regulate the exhaust system have not been maintained in a satisfactory manner from August 30, 2019, through August 7, 2020. This appears to be a violation of PTI No. 36-18 FGBOOTHs IV.1, and ACO AQD No. 9.A.1.,

It appears that Premier Finishes, LLC has not provided records on a monthly basis from August 2018 through February 2019, October through November 2019, and February through June 2020 as required per VII.1 The failure to provide the required monthly reports appears to be a violation of PTI No. 36-18 FGBOOTHs VII.1. and ACO AQD No. 9.C.1.

A violation notice shall be issued.



Image 1(GRATE 1 OF 2 2020080) : Section of floor grate covering dry particulate exhaust filter. Note that air flow through the grate is mostly obstructed.



Image 2(GRATE 2 OF 2, 202008) : Floor grate covering dry particulate exhaust filter. Note that air flow through the grate is mostly obstructed.

NAME *Robert Umarchi*

DATE August 25, 2020

SUPERVISOR *Joyce Z*