

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

N789664476

FACILITY: PREMIER FINISHES LLC		SRN / ID: N7896
LOCATION: 28060 GROESBECK HWY, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Brian Borowski , Partner		ACTIVITY DATE: 09/08/2022
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On September 8, 2022, I conducted an unannounced on-site inspection 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 this inspection 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.

HISTORY

Premier Finishes, LLC (Premier Finishes) is an automotive and truck repair, finishing, and detailing facility. Since the previous inspection, Premiere Finishes has eliminated most commercial vehicle work and now concentrates on performing bodywork directly for individual car enthusiasts. The first AQD inspection occurred on August 31, 2007, in response to a fallout complaint that was related to a grit blasting process, which has since been removed. Since that complaint, the AQD has conducted 10 on-site inspections, issued 8 violation notices, and entered into two Administrative Consent Orders with the Permittee, who has not resolved all violations related to surface coating and is past due with fines. On a positive note, regardless of the State of Michigan's enforcement actions, Brian Borowski, and all the Premier Finishes employees, have been welcoming and friendly during each inspection.

CONSENT ORDER AQD No. 2019-05

Per multiple Teams meetings with Jeff Rathbun, EGLE Senior Environmental Engineer; Premier Finishes is past due on the Consent Order payment schedule. Jeff informed me that Brian Borowski has not responded to phone calls, emails, and a certified letter. During our most recent discussion before the inspection on Thursday, September 8, 2022, Jeff Rathbun asked me to convey his request for Brian Borowski to resolve settlement issues, otherwise, escalated enforcement may be pursued. I did relay Jeff's statement.

EMISSION UNIT IDs

The emission unit summary table does not indicate which of the two emission units is the double-wide spray booth. I was able to associate each emission unit name with each spray booth by referencing FGBOOTHs, VIII STACK/VENT RESTRICTIONS table. EUBOOTH1 is a single-wide spray booth with a single exhaust stack. EUBOOTH2 is the double-wide spray booth with two exhaust stacks. For on-site reference, EUBOOTH1 is adjacent to the south wall, and EUBOOTH2 is adjacent to the north wall.

RECORDKEEPING

I reviewed the coating and solvent use log. Monthly usage records indicate the permittee did not exceed 25 gallons per month, which is in compliance with the permitted 100 gallon per month limit.

On September 8, 2022, I smelled strong solvent odors in the paint mixing room and observed that the paint mixing room waste drum lid did not properly close (Images 10 and 11). Therefore, the permittee failed to capture all waste materials and store them in closed containers. This constitutes a violation of PTI No. 36-18, FGBOOTHS Special Condition III.1, which states, "The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations." This noncompliance shall be cited in a violation notice.

On September 8, 2022, I smelled strong solvent odors in the paint mixing room and observed that the paint mixing room waste drum lid did not properly close. Therefore, the permittee failed to handle all VOC and HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions, and the permittee failed to keep containers covered at all times except when operator access is necessary. This constitutes a violation of PTI No. 36-18, FGBOOTHS Special Condition III.3, which states, "The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary." This noncompliance shall be cited in a violation notice.

On September 8, 2022, I observed that the permittee operated EUBOOTH1 while the exhaust filters were not properly installed, which provides a path for particulate material air contaminants in the exhaust to bypass the control device. This constitutes a violation of PTI No. 36-18, FGBOOTHS Special Condition IV.1, which states, "The permittee shall not operate FGBOOTHS unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner." This noncompliance shall be cited in a violation notice.

On September 8, 2022, I observed that the EUBOOTH2 west spray booth air balance actuator was removed from the damper control rod and the booth air balance pressure drop gauges were inoperative. Furthermore, the permittee operated EUBOOTH1 while the exhaust filters were not properly installed, which allowed particulate material air contaminants to bypass the control device. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. This noncompliance shall be cited in a violation notice.

The cited Special Conditions III.1, III.3 and IV.1 of PTI number 36-18 are also enforceable as paragraph 9.A.1 of Consent Order, AQD number 219-05. This noncompliance shall be cited in a violation notice.

CONCLUSION

A violation notice shall be issued citing the aforementioned noncompliances.



Image 1(IMG 0414) : EUBOOTH1, single-wide spray booth.



Image 2(IMG 0416) : EUBOOTH1 control panel.



Image 3(IMG 0417) : EUBOOTH1 booth air balance gauge. The orange-tipped indicator needle moves to the right side of the "Paint Zone" when the exhaust is turned on. This appears to indicate the pressure differential is within the manufacturer's specifications.



Image 4(IMG 0418) : EUBOOTH2 double-wide spray booth with a car in the foreground. This Emission Unit (EU) consists of two booths that are attached in the center. The large beige doors on the left are on the west side of the spray booth.



Image 5(IMG_0420) : EUBOOTH2 west booth ductwork. The west booth air balance actuator is disconnected from the damper. IMG_0421 provides a close-up view.



Image 6(IMG_0421) : EUBOOTH2. Close-up view of the west booth air balance actuator, which was removed from the damper control rod.



Image 7(IMG 0431) : EUBOOTH2 west (left) and east (right) control panels, each with a circular booth air balance gauge.

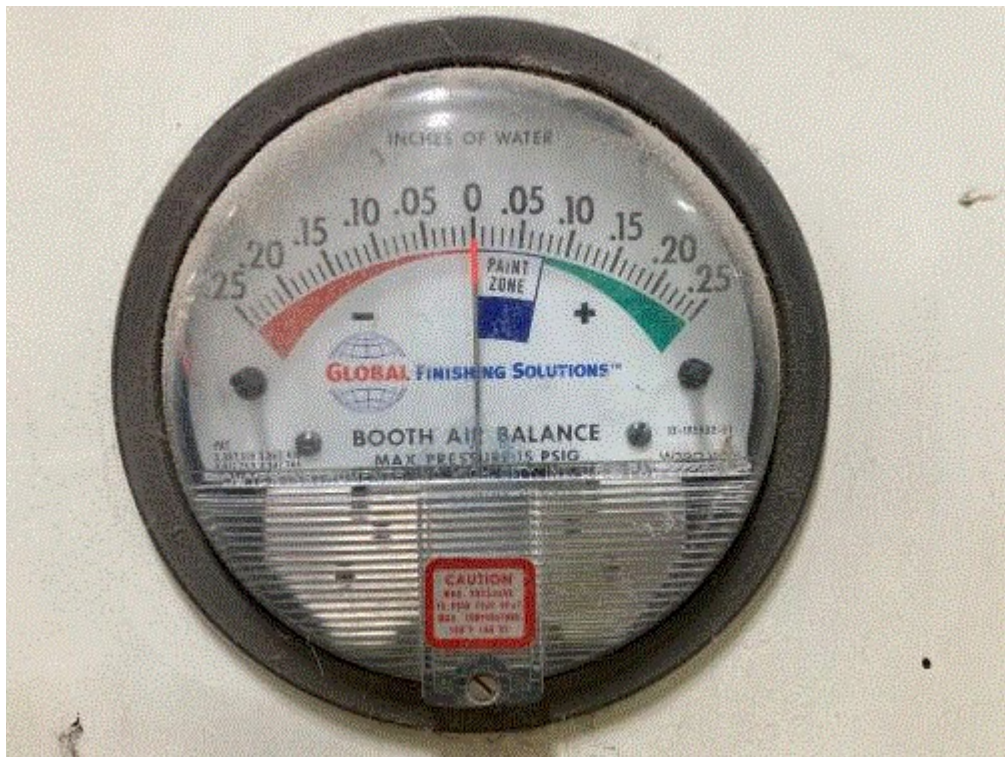


Image 8(IMG 0425) : EUBOOTH2, east side booth air balance gauge, which showed no (zero) deflection when the exhaust system, with dry particulate filters, is turned on. This non-functioning gauge is part of the emissions control device.



Image 9(IMG 0426) : EUBOOTH1. View of downdraft blanket filter at the east end of the booth. This image shows a gap in filter placement, along the right edge, that allows particulate material (PM) air contaminants to bypass the PM control device.



Image 10(IMG 0434) : Paint Mixing Room waste drum.



Image 11(IMG 0436) : Close-up view of drum lid in the full closed position. Note that the lid does not rest flush against the lip of the drum. This waste drum appeared to be the source of fugitive emissions, which caused a strong solvent odor in the paint room.



Image 12(IMG 0441): EUBOOTH2. View of the downdraft exhaust floor grates. The floor grates have been cleaned of material that obstructed the exhaust. All of the PM exhaust filters in EUBOOTH2 appeared to be properly installed.

NAME Robert Elmarchi

DATE 9/27/2022

SUPERVISOR Joyce