

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

N789668853

FACILITY: PREMIER FINISHES LLC		SRN / ID: N7896
LOCATION: 28060 GROESBECK HWY, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Brian Borowski , Partner		ACTIVITY DATE: 08/24/2023
STAFF: Owen Pierce	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 23 Inspection Report		
RESOLVED COMPLAINTS:		

On August 24, 2023, I conducted an unannounced on-site inspection of Premier Finishes, LLC, located at 28060 Groesbeck Highway, Roseville, Michigan. Robert Joseph (EGLE-AQD) joined me for the inspection. 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. Upon arrival, Robert and I met with Brian Borowski, Owner, and conducted a pre-inspection meeting where we introduced ourselves, presented our credentials, and stated the purpose of the inspection.

During our pre-inspection meeting, Brian explained the facility's processes and equipment. Premier Finishes, LLC (Premier Finishes) is an automotive and truck repair, finishing, and detailing facility. Their hours of operation are generally Monday - Friday, 9am-5pm. Currently there are 3 employees at the facility. Brian further explained that over the past few years, Premiere Finishes has eliminated most commercial vehicle work and now concentrates on performing bodywork directly for individual car enthusiasts.

AQD History with the Facility

According to previous inspection reports, 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 11 on-site inspections, issued 9 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.

CONSENT ORDER AQD No. 2019-05

Per multiple enforcement 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 the inspection I explained to Brian Borowski the need to contact Jeff in order to resolve the settlement issues, otherwise, escalated enforcement may be pursued.

PTI No. 36-18 Compliance Evaluation

The emission unit summary table does not indicate which of the two emission units is the double-wide spray booth, however during the inspection, I noticed that the booths were clearly labeled. 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.

Brian pulled up the floor grates in EUBOOTH1 and EUBOOTH2, and I observed that the dry filters in both booths were correctly maintained and in place. In EUBOOTH1, Brian explained that they regularly check the filters by taking up the grates and looking to see if the filters are fully covered with coating or not. In addition to the eye test, Brian explained that they use the differential pressure drop gauge affixed to the outside of EUBOOTH1 to determine when they need to change the dry filters. There is a "Paint Zone" indicator on the gauge where the needle sits when the airflow is good and it is ok to paint in the

booth. Brian explained that when the needle moves outside of the "Paint Zone" that is an indicator that it is time to change the filters.

During the inspection, 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. Brian explained that the pressure drop gauges for EUBOOTH2 were not operating properly and need to be fixed. He also explained that he recently paid for a company to come out and service EUBOOTH2. 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.

In the paint mixing room, I observed that all waste materials and VOC and HAP containing materials had closed lids and were handled in a way to minimize the generation of fugitive emissions.

Special Condition (SC) II.1 sets the material limit for coatings and cleaning solvents combined, at 100 gal/month. I reviewed the coating and solvent use logs that Brian provided, however the monthly usage records stopped at July 2022. There were no records from August 2022 to the day of the inspection. As of the date of this report, AQD has not received coating and solvent use records for the requested timeperiod of September 2022 - July 2023. Failure to maintain and provide records of the gallons of each coating material and cleaning solvent used is a violation of SC II.1, VI.1, and VI.3. This noncompliance shall be cited in a violation notice.

SC VI.2 states that the permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component, which may consist of Material Safety Data Sheets (MSDS). Brian had MSDS available at the facility, and I was able to review them during the inspection.

The cited SC II.1, VI.1, and VI.3 of PTI number 36-18 is also enforceable as paragraph 9.A.1 of Consent Order, AQD number 2019-05. This noncompliance shall be cited in a violation notice.

Conclusion

Based on the information obtained during the inspection, Premier Finishes LLC is in violation of PTI No.36-18, Special Conditions II.1, VI.1, and VI.3, and Rule 910. A violation notice for these violations will be issued.

NAME Owen Pierce

DATE 9/13/2023

SUPERVISOR K Kelly