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

FACILITY: Anderson Honda		SRN / ID: U631707534
LOCATION: 1819 S. Telegraph RD., Bloomfield Hills		DISTRICT: Southeast Michigan
CITY: Bloomfield Hills		COUNTY: OAKLAND
CONTACT: TJ Engle , Service Advisor		ACTIVITY DATE: 01/30/2018
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled Inspectie		
RESOLVED COMPLAINTS:	,	

On January 30<sup>th</sup>, 2018, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Staff, I, Adam Bognar, conducted an unannounced scheduled inspection of Page Honda of Bloomfield (Formaliy "Anderson Honda"), located at 1819 S. Telegraph Road, Bloomfield Hills, MI, 48302. 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, as amended (Act 451); Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules; and 40 CFR Part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning (NESHAP Subpart T).

I arrived at Page Honda at around 9:30 am and met with TJ Engle, Service Advisor. I identified myself, showed credentials, and stated the purpose of the inspection. Mr. Engle showed me around the facility. Page Honda of Bloomfield is a new and used car dealership that also performs routine maintenance on cars. During the inspection there were several cars up on hoists receiving various maintenance.

I informed Mr. Engle that I was interested in seeing a halogenated cold cleaner that was previously operated here. He showed me to the only cold cleaner on site. The cold cleaner setup is a sink on top of a solvent containing drum. Solvent from the drum is pumped through a faucet to wash parts in the sink. There was no solvent in the sink during the inspection. The lid was closed.

Mr. Engle informed me that the cold cleaner is not used often. The only time they use it is to clean out oil pans. A company called Vesco comes in once per month to perform routine maintenance on the cold cleaner and to change out the solvent. The solvent used is no longer the halogenated substance (methylene chloride) that was used in the past. I observed the last bill of lading from Vesco which showed that petroleum naptha is the solvent currently used. There was not a sticker on the tank showing the proper operating procedures. I emailed the MDEQ "Cold Cleaner Operating Procedures" placard to TJ Engle and his associate Amy Hull and informed them that it is required that this sticker be clearly posted near the cold cleaner.

The air/vapor interface of the cold cleaner is approximately 2'x2' (4 ft<sup>2</sup>). The cold cleaner appears to be exempt from Rule 201 requirements pursuant to Rule 281 (2)(h). Since there is no longer a ' halogenated solvent cleaning tank this facility does not appear to be subject to NESHAP Subpart T any longer.

There are small buffing stations located throughout the shop. The stations are exhausted to the general in-shop environment. The buffing operations appear to be exempt from Rule 201 requirements pursuant to Rule 285 (2)(l)(vi)(B).

I left the facility at around 9:50 am.

## **Compliance Determination**

Page Honda of Bloomfield appears to be in 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, as amended (Act 451); and Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules. The facility is no longer subject to NESHAP Subpart T.

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DATE 2/23/2018 SUPERVISOR\_SK