

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

U63210677862850

<b>FACILITY:</b> Farmington Hills Collision Center		<b>SRN / ID:</b> U632106778
<b>LOCATION:</b> 34600 W. 8 Mile Road, Farmington Hills		<b>DISTRICT:</b> Warren
<b>CITY:</b> Farmington Hills		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Scott Marsonек , Manager		<b>ACTIVITY DATE:</b> 05/11/2022
<b>STAFF:</b> Kerry Kelly	<b>COMPLIANCE STATUS:</b>	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> Self initiated inspection and complaint investigation.		
<b>RESOLVED COMPLAINTS:</b> C-22-00799		

On May 11, 2022, I (Kerry Kelly), Michigan Department of Environment, Great Lakes and Energy-Air Quality Division (EGLE-AQD), conducted a self-initiated inspection and odor complaint investigation in the vicinity of Farmington Hills Collision Center located at 34600 W. 8 Mile Road, Farmington Hills, MI 48335. Noshin Khan, EGLE-AQD, accompanied me during the inspection and investigation. The inspection/investigation was in response to an odor complaint that was filed with the EGLE Warren district office. The odor complaint was received by Robert Joseph on May 11, 2022 (complaint number C-22-00799) via phone. The complainant contacted the AQD shortly after 10:30 AM stating that a chemical-like nuisance odor (intensity 3 to 4) is originating from Farmington Hills Collision. They stated the nuisance odor is detected at least on a weekly basis. Wind speed and direction at the time of detection is under 10 mph from the south.

The odor intensity scale, as mentioned in this report, is:

<u>ODOR SCALE</u>	<u>ODOR CHARACTERISTIC EXAMPLES:</u>
0 - Non-Detect	Paint-like Musty, moldy Burnt, smoky Tar-like, asphalt Cut grass Citrus fruit
1 - Just barely detectable	
2 - Distinct and definite odor	
3 - Distinct and definite objectionable odor	
4 - Odor strong enough to cause a person to attempt to avoid it completely	
5 - Odor so strong as to be overpowering and intolerable for anylength of time	

Noshin and I arrived in the parking lot of a vacant building directly east of Farmington Hills Collision at approximately 12:30 PM. At the time we arrived, the temperature was 79 degrees Fahrenheit and the wind was from the southeast at approximately 7 mph according to The Weather Channel app. I observed a flag in front of the car wash directly west of Farmington Hills Collision blowing in a north-westerly direction, verifying the wind direction was from the southeast.

We left the parking lot at approximately 12:30 PM and drove with the vehicle windows down to locations upwind (SSE to SE) and downwind (NW) of Farmington Hills Collision.

We did not detect any chemical, paint-like, or solvent odors while driving & stopping upwind (SSE to SE) of the facility between 12:30 PM and about 12:40 PM.

Between 12:44 PM and 12:52 PM, we intermittently (about 1-5 seconds duration, once or twice) detected level 1 intensity paint/solvent-like odors when standing at a location approximately 630 feet almost directly north of Farmington Hills Collision's stacks. At locations between 750 and 1,000 feet NNW of Farmington Hills Collision's stacks, from 12:53 PM to 1:01 PM, we detected intermittent (about 2-3 seconds duration, three or four times), level 1 - 3 intensity, paint/solvent like odors. I observed the stacks for Farmington Hills Collision while doing the downwind odor observations and did not see any opacity. On two occasions in the NNW location I detected soap-like odors in addition to the paint/solvent-like odors. There is a automatic, drive-through car wash directly west of Farminton Hills Collision.

Attached is a map of the route taken and locations of upwind and downwind odor observations (Attachment 1).

Following the odor observations, Noshin and I went to the complainant's location and knocked on the door, no one answered.

We then drove to Farmington Hills Collision. We entered the lobby at Farmington Hills Collision and introduced ourselves to the person sitting behind the counter, Amanda Kovach. I showed my photo credentials, gave my business card, and explained the purpose of the visit to Amanda. While I was speaking with Amanda, Scott Marsonsek, Owner, walked up and offered to show Noshin and I processes at the facility.

According to the website for the facility, Farmington Hills Collision Center is a family owned and operated Company that has been providing auto body repair services for over 30 years. During the facility walk-through, I observed two downdraft paint booths, a sanding area with two large exhaust systems, and a paint storage room with a BECCA paint gun cleaner.

Except as allowed in Rule 202, Rule 277 through 291, or Rule 1823(15), Rule 201 of the Michigan Air Pollution Control Rules, prohibits the installation, construction, reconstruction, relocation, or modification of any process or process equipment which may emit any air contaminant, unless a permit to install that authorizes such action is issued by the department.

Surface coating lines with a coating use rate not more than 200 gallons per month, minus water, records of coating usage rates on file, and supplied with a dry filter control which is properly installed, maintained, and operated, are exempt from the requirement in Rule 201 to obtain a permit to install (PTI) per Rule 287(2)(c). Amanda sent monthly coating purchase records for January 2021 through April 2022 and booth maintenance records (Attachment 2). These records indicate the highest monthly coating purchase was 15 gallons in January 2022. Amanda also sent the Safety Data Sheet (SDS) for the clear coat and one base coat used at the facility (Attachment 3). The clear coat contains 2 parts, a reducer and a hardener. The SDS for the reducer states the VOC content minus water is 7.6 lb/gal. I only found one ingredient (cumene 0-1%) listed in the SDS for the reducer on EPA's list of hazardous air pollutants (HAP). The hardener SDS states the VOC content minus water is 2.9 lb/gallon. I did not find any of the ingredients listed in the SDS for the hardener on EPA's list of HAP.

I inspected the filters for one of the paint booths at Farmington Hills Collision. The filters were properly installed and maintained, no gaps nor paint overspray deposits. I observed a worker applying paint to a vehicle using a spray gun in the other paint booth. Scott, Noshin, and I went to the facility's parking lot and stood about 250 feet downwind (NNW) of the paint booth stacks to do odor observations. While in the parking lot between about 1:15 and 1:30 PM, I detected level 1-2 intensity, solvent-like odors on at least two occasions (1:17 PM and 1:25 PM) with a duration of about 1-2 seconds each time. Scott stated he detected the solvent odors at the same time as I did when we were in the parking lot.

The autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations at Farmington Hills Collision may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. EGLE-AQD has not accepted delegation to implement and enforce this NESHAP.

After the parking lot, we went to an area inside at the front of the building where sanding takes place. In this area there are two filter systems. Each filter system had particulate filters, approximately 10 feet x 3 feet, on the sides facing the sanding area and each were exhausted through a stack to the ambient air. I inspected the filters and determined, based on the appearance, that they were appropriately designed and maintained. Equipment used for sanding metals, plastics, and fiberglass with appropriated designed and operated fabric filter systems, and mechanical pre-cleaners for operations involving metal, are exempt from the requirement in Rule 201 to obtain a PTI per Rule 285(2)(l)(vi).

Next, Scott showed us the paint storage room. In the paint storage room, I observed a BECCA paint gun cleaner/solvent recycling system. The BECCA has a solvent tank, filter, solvent supply hose, and wash basin. The gun cleaner/solvent recycling system opening and wash basin are approximately 1.5 feet x 2 feet (3 square feet). The BECCA works by connecting the paint gun to a hose on the BECCA. A pneumatic pump pulls solvent from a container below the basin through the hose and gun. Fumes are exhausted when the operator turns on the "Fume Extractor/POWER CLEAN" dial. The fumes go through the vapor chimney (a six inch diameter duct on the top of the cleaner) and are discharged to the ambient air. Spent solvent drains through an approximately 1 inch hole in the bottom of the cleaner basin, is filtered to remove solids, then stored in the solvent container for re-use. The basin is covered by a wash grill which can be used for draining parts and does not have a cover. Scott stated that using the BECCA to clean guns has resulted in an about 70% reduction in the quantity of solvent he has to send off as waste. An operator in the room during the inspection indicated that he had used the gun cleaner in the timeframe we were in the parking lot. The

operator also showed me the fume extractor switch and turned it on as a demonstration. The odors in the paint storage room near the BECCA smelled the same as the solvent odors detected downwind of Farmington Hills Collision. Amanda sent the SDS for the solvent used in the BECCA (Attachment 4). The SDS indicates the product is Keystone K 5 Gun Wash and contains 30-50% each of methanol and toluene and 10-20% acetone, all of which are VOCs, methanol and toluene are HAP. The stated vapor pressure at 77 degrees Fahrenheit is 231 mmHg (approx. 4.5 psi).

Per Rule 281(2)(h), the requirement in Rule 201 does not apply to cold cleaners that have an air/vapor interface of not more than 10 square feet. A cold cleaner, according to Rule 103(aa), means a tank containing organic solvent with a volatile organic compound (VOC) content of 5% or more, by weight, and at a temperature below its boiling point that is used to spray, brush, flush, or immerse metallic and/or plastic objects for the purpose of cleaning or degreasing. The BECCA at Farmington Hills Collision is similar to the solvent drum mounted and directed stream cold cleaners I have observed at other facilities, except that, the BECCA does not have a lid covering the basin, has a fan directing emissions to a stack, and filters spent solvent. When in use, the emissions from the BECCA should be similar to solvent drum mounted, directed stream cold cleaners using the same solvent. There may be emissions from the drain hole opening of the BECCA when not in use because the basin is not covered.

Rule 707 of the Michigan Air Pollution Control Rules contains requirements that apply to cold cleaners. Rule 707 requires the following:

- The cold cleaner shall be equipped with a device for draining cleaned parts and the parts shall be drained not less than 15 seconds or until dripping ceases
- The cold cleaner shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner
- Written operating procedures shall be posted in an accessible, conspicuous location near each cold cleaner
- Waste solvent shall be stored only in closed containers, unless demonstrated to be a safety hazard and disposed of in a manner such that not more than 20% by weight is allowed to evaporate into the atmosphere

As previously noted, the basin of the BECCA has a wash grill which can be used for draining parts, but does not have a cover. I mentioned the cover requirement to Scott and he stated the unit did not come with a cover. According to the BECCA website, covers are optional equipment. I am not sure if the BECCA optional cover would prevent emissions when the unit is not in use because the exhaust vent could still be open, allowing emissions, when the cover is closed. A cover over the basin, between the drain hole and exhaust opening would be more effective based on my knowledge of the BECCA design. During the inspection, waste solvent was stored in closed containers. I did not look for posted instructions while inspecting the BECCA. I will inform Scott that Rule 707 requires instructions to be posted.

Rule 707(2) and (3)(a) contain requirements for cold cleaners where the solvent is heated or that use solvents with a Reid vapor pressure greater than 0.6 psia or 0.3 psia respectively. I need to conduct further research on these requirements to determine whether they apply to the BECCA at Farmington Hills Collision.

Though the paint booths and BECCA paint gun cleaner may meet one of the PTI exemptions in Rules 280 - 291, without enforceable restrictions on emissions from these emission units, Farmington Hills Collision is considered a major source of HAP according to current AQD supervisor guidance. This guidance is based, in part, on the technical support document for Rule 287(2)(c). The tech support document states the coating use rate of 200 gallons per month would result in VOC emissions less than 10 tons/year and therefore would be considered Best Achievable Control Technology (BACT) for the coating line. The less than 10 tons/year in the tech support document was calculated assuming a worst-case VOC content per gallon of 7.5 lbs minus water as applied. 200 gallons x 7.5 lb/gallon would equal 9 tons/year VOC emissions for one booth. Sources with 2 coating lines would have potential VOC emissions of 18 tons/year. The supervisor guidance assumes that all 18 tons of VOC is a single HAP and does not take into consideration the VOC content of the materials actually used at a facility because there is not restriction on the VOC or HAP content in the exemption. At 18 tons/year of a single HAP, a source with 2 coating booths using the exemption in Rule 287(2)(c) with no other restrictions would exceed the major source threshold for a single HAP (10 tons/year) and would be subject to Title V and Rule 210 permitting requirements.

Rule 211(a)(i)(A) of the Michigan Air Pollution Control Rules requires sources that directly emit, or have the potential to emit, 10 tons per year or more of an individual hazardous air pollutant (HAP) obtain a Renewable

Operating Permit (ROP). Rule 210 prohibits the operation of a source required to have an ROP except in compliance with all applicable terms and conditions of an ROP, unless a timely and administratively complete ROP application has been received. Per Rule 210(4), for a stationary source that is or becomes a major source, as defined by Rule 211(1)(a)(i) to (iii), an administratively complete application shall be considered timely if it is received by the department not more than 12 months after the stationary source commences operation as a major source or otherwise becomes subject to the requirements to obtain a renewable operating permit as a major source.

To avoid Title V and Rule 210 requirements without making process changes, Farmington Hills Collision can either obtain a HAP opt-out permit or a New Source Review (NSR) permit for the coating booths and gun cleaner that limits the combined VOC emissions to less than 10 tons/year. Completing a HAP opt-out permit application requires little to no knowledge of air quality regulations. A complete NSR permit application requires a sound understanding and knowledge of air quality rules. However, recordkeeping and reporting requirements that come along with an approved HAP opt-out permit are more onerous than a NSR permit. A HAP out-out permit would require the facility to calculate and keep records of individual and aggregate HAP emissions for all HAP emitting processes and equipment at the facility, report criteria pollutant emissions to the Michigan Air Emissions Reporting System (MAERS) annually, and pay an annual fee of \$250. If the facility gets a NSR permit, they will not have to report to MAERS or pay an annual fee. In addition, calculating emissions to comply with the permit will likely be less complicated.

Shamim Ahammod, EGLE-AQD, conducted a complaint investigation/on-site inspection at Farmington Hills Collision on Dec. 15, 2021. Following the inspection, in February 2022, Shamim notified Scott of the need to obtain a PTI. During the inspection I conducted on May 11, 2022, Scott stated he didn't have the personnel resources to complete a permit application. I will give Scott and Amanda the contact information for Jenifer Dixon, Air Quality Liason, Environmental Support Division. Jenifer stated she can help the facility prepare a permit application.

Due to the actual paint usage for both booths at Farmington Hills Collision being, at most, 7.5% of the total amount allowed for one booth in Rule 287(2)(c) and, based on my conversations with other AQD inspectors indicating they don't expect collision shops to obtain a Title V permit, I will not be issuing a notice of violation for Rule 210.

Regarding the odor complaint, the solvent/paint-like odors detected during this inspection were not of the intensity or duration expected to cause an unreasonable interference with the comfortable enjoyment of life and property. Additional complaints or information is necessary before futher action can be taken.

NAME K. Kelly

DATE 6/6/22

SUPERVISOR Joyce