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

N319648098

FACILITY: CLIFT PONTIAC		SRN / ID: N3196
LOCATION: 1115 S MAIN ST, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: Toni Marry, Service Manager 2019		ACTIVITY DATE: 03/12/2019
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection	of Clift Pontiac.	
RESOLVED COMPLAINTS:		

Minor Source: Scheduled Inspection of Clift Pontiac

Facility Contacts:

Toni Marry - Service Manager

Phone: 517-263-6986

Email: tmarry@cliftauto.com

Website: cliftauto.com

Purpose

On March 12, 2019, I conducted an unannounced compliance inspection of Clift Pontiac, located at 1115 S. Main St. Adrian, MI. I was accompanied by Brian Carley of the AQD Jackson Field Office. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act.

Facility Location

The facility is located on a commercial strip of road, southeast of a residential area. See Image 1 for an aerial photo.

Facility Background

Clift Pontiac is a car dealership and service center located in Adrian, MI.

The last inspection of the facility was conducted on May 5, 2009. At that time, the facility was found to be in compliance. The facility uses waste oil fired heaters to heat their service area. During the last inspection it was noted that they had seven heaters on site, and they all met the Rule 282(2)(b)(iv) exemption.

Regulatory Applicability

The facility's last Permit to Install (PTI) was voided on 10/12/2009 due to the permitted units qualifying for an exemption. Therefore, there are no active permits on file with AQD for this facility.

Arrival & Facility Contact

No visible emissions or odors were observed upon our approach to the facility. We arrived at approximately 10:50 AM, proceeded to the facility office to request access for an inspection, provided our identification, and met with Toni Marry, service manager for Clift. A pre-inspection discussion was held with Toni. We informed her of our intent to conduct a facility inspection and to review the various records as necessary. She extended her full cooperation, accompanied us during the full duration of the inspection, and fully addressed our questions.

Pre-Inspection Meeting

I began by explaining to Toni that their facility previously had a PTI for the waste oil fired heaters that they use. I told her that an inspection had been conducted about 10 years ago and it was determined that the heaters met a qualified PTI exemption. Therefore, their permit has since been voided. I explained that their facility was still on our list of inspections, however, so I was there to see the heaters and any other processes that may be related to our division.

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Toni explained that they currently still use the waste oil heaters, of which they have six, but it has become very expensive to have them fixed and maintained. She said that they are considering removing them within the next year.

Onsite Inspection

Toni proceeded to guide us on a tour of the facility. We started by entering the quick lube area. This is where the first heater is located. The heaters are mounted to the wall, with the heating unit near the ceiling and the oil reservoir on the ground. We proceeded to look at all the remaining heaters, which includes one in the car wash bay, two in the shop area, one in the detail area, and one in the paint shop area. The ones in the car wash bay and the shop area were not operating during the inspection.

We then asked Toni about the paint booth located on site. This is an enclosed booth with a dry filter control, and it has its own dedicated exhaust. Toni didn't know about the specifics regarding the paint usage, so she took us into the detailing division's office. Tim Cline, the body shop manager, was out to lunch, but I left my contact information and Toni assured me that she would follow up to get the requested paint records.

We then inquired about any parts washers that they have on site. She informed us that they have two, and she showed us over to them. Neither of them were in use at the time of the inspection. The first one we observed had the lid closed, but the second one had the lid open. We explained to Toni the proper operating procedures, which include keeping the cover closed when it is not in use. We provided Toni with the cold cleaner operating procedure stickers and discussed where they should be posted and the rules that are listed on the back. She also stated that the waste from the parts washers is picked up by Safety Kleen.

Recordkeeping Review

Attachment 1 shows the purchase records for the materials used in the spray booths for 2017 and 2018.

Attachments 2-8 are the SDS provided for the materials used in the spray booth.

The records show compliance with permit exemption Rule 287(2)(c). The company shows as having only purchased 90.13 gallons of product for the year 2018 and 127.15 gallons for 2017. This alone is less than the 200 gallon per month requirement outlined in Rule 287(2)(c)(i). If you break that down by month and assume that what the company buys is what they use per month, then they used approximately 7.51 gallons per month in 2018 and 10.60 gallons per month in 2017.

Post-Inspection Meeting

We held a brief post-inspection meeting with Toni. We discussed the records that are needed to determine compliance and when they would be expected by. We also went over the PTI exemption handbook and discussed the exemptions that relate to the processes that we observed. We explained that the spray booth exemption indicates that coating use records be maintained, so we advised her to start keeping those records.

Lastly, we told Toni that a report would be filed documenting the findings from the inspection, and we explained that a copy would be sent to the company.

We thanked Toni for her time and cooperation, and we departed the facility at 11:15 AM.

Compliance Summary

Permit exemption Rule 282(2)(b)(iv) applies to the waste oil fired heaters.

Permit exemption Rule 287(2)(c) applies to the paint booth.

Permit exemption Rule 281(2)(h) applies to the cold cleaners.

Based upon the facility inspection, review of the records, and review of applicable requirements the company was found to be in compliance at the time of this inspection.

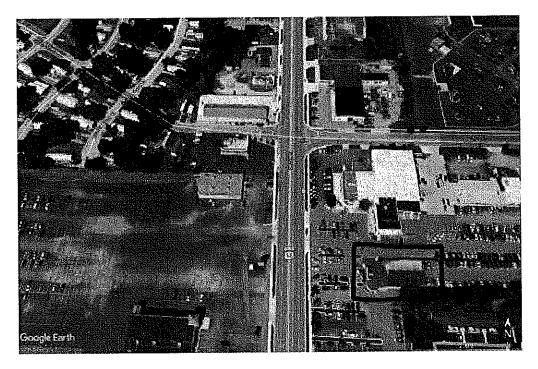


Image 1(1) : Aerial photo.

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