

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

N789673314

FACILITY: PREMIER FINISHES LLC		SRN / ID: N7896
LOCATION: 28060 GROESBECK HWY, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Brian Borowski , Partner		ACTIVITY DATE: 08/28/2024
STAFF: Owen Pierce	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 24 Inspection Report		
RESOLVED COMPLAINTS:		

On August 28, 2024, 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. Upon arrival, I met with Brian Borowski, Owner, and conducted a pre-inspection meeting where I introduced myself, presented my 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, Premier 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 12 on-site inspections, issued 10 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, nor certified letter.

PTI No. 36-18 & Consent Order AQD No. 2019-05 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 as required in Special Condition (SC) III.4. 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.

I observed that the dry filters located in the floor grates in both booths were correctly maintained and in place as required in SC IV.2. Brian explained that for both booths, the facility regularly checks 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 a differential pressure drop gauge affixed to the outside of EUBOOTH1 and EUBOOTH2 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.

In September 2023, a violation notice was issued for the EUBOOTH2 west spray booth air balance actuator being removed from the damper control rod and for the booth air balance pressure drop gauges being inoperative as observed during the last inspection. During the inspection this year, I observed that the EUBOOTH2 west spray booth air balance actuator and east spray booth air balance actuator have been replaced and the pressure drop gauges have been repaired, and EUBOOTH2 is now back in operation. At the time of the inspection, the west booth of the EUBOOTH2 double wide spray booth was prepped for the coating of a boat. Brian explained that the east half of the double wide spray booth is almost exclusively used for stripping automotive vehicles when prepping them to be coated, while the west half is used for coating purposes. Brian explained that the doors on either side of the west half of EUBOOTH2 are shut and the exhaust system is turned on when coating is being applied to the various automotive vehicles that the facility services. Based on the observations made during the inspection this year, the violation cited in September 2023 will be resolved.

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 as required in SC III.3.

SC II.1 sets the material limit for coatings and cleaning solvents combined, at 100 gal/month. In September 2023, a violation notice was issued to the facility for failure to maintain records of the gallons (with water) of each coating material and cleaning solvent used on a calendar month basis for the time period requested. Following this year's inspection, I reviewed the monthly coating and solvent use logs that Brian provided via email from September 2023 to August 2024. Provided records can be found internally at the following link: S:\Air Quality Division\STAFF\Owen Pierce\FY 24\Premier Finishes.

Compliance with this material limit is based on the recordkeeping requirements found in SC VI.1 and VI.3. After a review of the records, all months from September 2023 to August 2024 were under the 100 gal/month coating and cleaning solvent material limit, and the highest recorded coating and cleaning solvent usage was 4.2 gal/month as recorded in November 2023. Based on the records received for this year's inspection, the violation cited in September 2023 will be resolved.

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.

SC VII.1 and Consent Order AQD No. 2019-05 stipulation 9.C.1 (Reporting Compliance) state that the facility shall submit reports on a monthly basis for the first 12 months after permit issuance, quarterly reports for the following 12 months after permit issuance and reports every 6 months thereafter. After a minimum of one (1) year of 6-month reporting, the company may petition the AQD District Supervisor to reduce the frequency of reporting and/or request to terminate reporting. These reporting requirements are regarding the monthly coating use records that the facility is required to keep in SC VI.3. The last time this special condition was evaluated was in a May 2021 inspection report completed by the previous inspector assigned to this facility where both the inspector and facility agreed to a bi-monthly submittal of records. It is unclear whether or not another agreement to reduce the frequency of reporting has been agreed upon by AQD and the facility since that May 2021 inspection report as there has been no mention of compliance with this condition in any of the AQD files since then. In addition, during my inspection this year, I observed that the facility has records on file for the past two years over which time I have been assigned as the inspector for this facility. Therefore compliance with this special condition was not evaluated during this inspection.

Consent Order AQD No. 2019-05 stipulation 9.A.1 (Permit Compliance) states that on and after the effective date of this Consent Order, the company shall comply with PTI No. 36-18 and any subsequent permit revision. After evaluating the information obtained during this inspection, the facility is in compliance with PTI No. 36-18 and therefore is in compliance with stipulation 9.A.1.

Consent Order AQD No. 2019-05 stipulation 9.B.1 (Operating Conditions Compliance) states that on and after the effective date of this Consent Order, the company shall not operate a sand blasting process at the facility unless the process meets the requirements of Mich Admin Code, R 336.1285(2)(l)(vi) (Rule

285(2)(l)(vi) allows for sand blasting processes to be exempt from Rule 201 when the process emissions are released to the general in-plant environment or, if externally vented, the emissions are controlled by an appropriately designed and operated fabric filter collector. During the inspection, I observed that there were no sand blasting processes being operated at the facility, therefore the facility is in compliance with stipulation 9.B.1.

Conclusion

Based on the information obtained during the inspection, Premier Finishes LLC is in compliance with PTI No.36-18 and the Permit, Operating Conditions, and Reporting, compliance stipulations stated in Consent Order AQD No. 2019-05.

NAME 

DATE 9/10/2024

SUPERVISOR 