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

FACILITY: MILOSCH'S PLACE COLLISION CENTER		SRN / ID: P0733
LOCATION: 4800 S LAPEER ROAD, LAKE ORION		DISTRICT: Southeast Michigan
CITY: LAKE ORION		COUNTY: OAKLAND
CONTACT: Brian Boreo , Manager		ACTIVITY DATE: 01/30/2018
STAFF: Adam Bognar	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted Inspection	l	
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 targeted inspection of Milosch's Palace Collision Center located at 4800 South Lapeer Road, Lake Orion, MI, 48362. 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); and Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules. This facility currently operates without a permit.

Milosch's Palace Collision Center is a body shop and collision repair center that also does auto glass repair and glass replacement. I arrived at the facility at around 10 am. I met with Brian Boreo, Manager. I identified myself, provided credentials, and stated the purpose of the inspection. Brian gave me a tour of the facility and explained the various processes.

Two spray booths are in operation. The booths are used to paint automotive parts/cars using paint guns. The booths are equipped with dry filters located in the floor. The floor filters in both booths were in place and appeared to be in good shape. Downstream from the floor filters, there is an additional dry "pocket style" filter located just before the blower and building exhaust stack. The pocket filters in both booths were in place and in good condition. The floor filters are replaced once per month and the pocket filters are replaced every two weeks.

There is portable spray area used for small jobs that consists of a plastic enclosure and a fabric filter/blower setup. The plastic enclosure is approximately 5'x5'. The paint jobs are sprayed right in front of the filter so that most of the emissions are captured. The filters were in place and in good shape.

Most of the paint is water based with the exception being the clear coat, which is solvent based. Mr. Boreo provided me with paint usage records for 2017 which indicate that the combined paint usage of all booths is less than 200 gallons per month, including water. The total usage for the year of 2017 was 634 gallons, including water. The paint booths at this facility appear to be exempt from Rule 336.1201 requirements pursuant to Rule 336.1287 (2)(c).

There is a paint storage area in the center of the building. The paint room was relatively clean and the lids on the paint cans were sealed. No strong odors were noted in the paint room. They appear to be storing the paints using good pollution prevention techniques.

A solvent based cold cleaner is present in the paint room used to wash paint guns between uses. The air/vapor interface is approximately 2'x2'. The solvent used, known as "Laquer Thinner", consists of methyl alcohol, toluene, acetone, petroleum distillates, and dimethoxypropane. It is stored in a 55-gallon drum located next to the cold cleaner. The solvent is cleaned and recovered each Monday using a solvent recovery system adjacent to the cold cleaner. The solvent recovery system filters out the paint solids and returns the solvent to the gun cleaner. The cold cleaner appears to be exempt from Rule

336.1201 requirements pursuant to Rule 336.1281 (2)(h).

There is a waste oil burning space heater present in the general storage area of the building. The maximum heat input of the space heater is 300,000 BTU/hr. Two waste oil containing storage tanks are located adjacent to the general storage area. Mr. Boreo stated that most of the waste oil used for the space heater is not generated on site. Instead, a majority of waste oil is brought in from other locations. A lesser quantity of waste oil generated at the facility is also used.

MDEQ-AQD Rule 336.1282 (2)(b)(iv) that would allow this space heater to be operated without a permit to install states, in part, that the space heater must burn "waste oil or used oil fuels that are generated on the geographical site and the equipment has a rated heat input capacity of not more than 500,000 BTU/hour. Operation of this space heater with waste oil that was not generated on the geographical site of the space heater is not in compliance with Rule 336.1282 (2)(b)(iv) and is a violation of Rule 336.1201 to obtain a permit to install. A violation notice was sent to the facility on March 2, 2018.

## Compliance Determination