

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

U50200309059085

FACILITY: Ziebart		SRN / ID: U502003090
LOCATION: 44033 Van Dyke Ave., Utica		DISTRICT: Warren
CITY: Utica		COUNTY: MACOMB
CONTACT: Greg Brys , Store Manager		ACTIVITY DATE: 07/28/2021
STAFF: Adam Bogнар	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On July 28, 2021, Michigan Department of Environment, Great Lakes, and Energy– Air Quality Division (EGLE-AQD) Staff, I, Adam Bogнар conducted a scheduled inspection of Ziebart at 44033 Van Dyke Ave, Utica, MI, 48317. 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 Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules. This facility currently operates without a permit to install.

I arrived at the facility at around 10 am. I met with Mr. Greg Brys, Store Manager. I identified myself and stated the purpose of the inspection. Mr. Brys gave me a tour of the facility. Ziebart specializes in automotive aftermarket protections. Services provided include detailing, paint protection, window tint, rust protection, undercoating, and spray-on bed liner. Ziebart operates Monday through Friday from 7:45 am to 5:30 pm, and Saturday until 4:30 pm.

There are two spray booths at Ziebart. Both are controlled by fabric filters. One booth is used only for applying bed liner to truck beds (“Rhino” liner). The other booth is used only for applying rust preventative coating. No automotive paint is applied at this facility. The filters in both booths appeared to be installed correctly with no gaps around the edges or tears in the filter. All solvents/coatings were stored in sealed drums.

Mr. Brys provided me with coating usage records. I reviewed records from January to June 2021. These records show that for the month of June 2021, 38 gallons of Rhino bed liner were used, and 70 gallons of rust preventative coating were used. This was the highest usage for the periods I reviewed. In January 2021, 43.5 gallons of Rhino bed liner were used, and 68.75 gallons of rust preventative coating was used. Though the fabric filters are installed and usage records are maintained showing that coating use is less than 200 gallons per month, the booths are excluded from exemption per Rule 278 because the potential to emit an individual Hazardous Air Pollutant (HAPs) from these two coating booths exceeds 10 tons per year.

This Potential to Emit (PTE) is determined by taking the Rule 287(2)(c) limit of 200 gallons per month per booth and multiplying that by the worst case HAP content of 7.5 pounds per gallon, minus water, as applied. 400 total gallons per month equates to 4800 gallons per year. 4,800 gallons multiplied by 7.5 lbs/gallon equals 36,000 lbs of HAPs (18 tons).

I reviewed safety data sheets for both the Rhino bed liner and the rust preventative coating. Neither the bed liner nor the rust preventative coating contain any HAPs. Mineral spirits are the only VOC present in the rust preventative coating at around 60%. The Rhino Liner contains up to 75% polyols (VOC), but the majority of these polyols are intended to polymerize into the bed liner rather than evaporate while curing. It appears that no HAPs are emitted from this facility, only VOC.

Although there are no HAPs currently used at Ziebart, there are no enforceable limits in place that prevent Ziebart from switching to HAP containing materials in the future. Thus, Ziebart must obtain an opt-out Permit to Install from the AQD for both the Rhino bed lining spray booth and the rust preventative coating spray booth. I informed Mr. Brys on August 3rd, 2021 that Ziebart is required to get an opt-out permit to install for the coating booths. Mr. Brys stated that he is going to reach out to Ziebart corporate for guidance on this issue.

Operating these two coating booths without a permit to install is a violation of AQD Rule 201. I discussed this issue with AQD district supervisor Ms. Joyce Zhu. AQD will not issue a violation notice for this non-compliance so long as Ziebart obtain an opt-out permit to install for the two coating booths in a timely manner.

Compliance Determination

Ziebart must obtain a permit to install from the AQD for the two coating booths. Operating these booths without a permit to install is a violation of EGLE-AQD Rule 201. AQD will be working with Ziebart to ensure that a permit to install for the two coating booths is obtained in a timely manner.

Ziebart appears to be in compliance with all other 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 Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules.

NAME Adam Bogner

DATE 9/9/2021

SUPERVISOR K. Kelly