

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

U63180428672085

<b>FACILITY:</b> Caliber Collision		<b>SRN / ID:</b> U631804286
<b>LOCATION:</b> 22031 Woodward Ave, Ferndale		<b>DISTRICT:</b> Warren
<b>CITY:</b> Ferndale		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Sean Green , General Manager		<b>ACTIVITY DATE:</b> 05/30/2024
<b>STAFF:</b> Jillian Cellini	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> On-site Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On Thursday, May 30<sup>th</sup>, 2024, I (Jillian Cellini, EGLE-AQD) and Noshin Khan (EGLE-AQD) conducted an inspection of Caliber Collision located at 22031 Woodward Avenue, Ferndale, Michigan. The purpose of the inspection was to determine the facility's compliance status 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 Public Act 451, as amended (Act 451); the AQD administrative rules.

Noshin and I arrived at the facility at around 10:30 AM. During the inspection we were assisted by Sean Green (General Manager) and Dave Rinvelt (Regional Manager).

Caliber Collision is a national chain of automobile body shops. The Ferndale, Michigan location was formerly Minser's Collision, but was bought by Caliber Collision in October 2022. Caliber Collision took over operations fully in January 2023. This facility operates from 7:30 AM – 5:30 PM, Monday – Friday, and has 10 full-time employees. Caliber Collision specializes in body repairs to automobiles. Sean explained that other maintenance work (e.g., oil changes, radiator repairs, etc.) is usually outsourced to another company, though proper containment (appropriately labelled waste barrels) for these activities is maintained in the event they are performed at this location. According to Sean, materials are properly disposed of on a regular basis, even if the container is not full. The shop has two rooms used for car repair that have large garage doors, and an office where customers are initially received. This facility is also equipped with a water filtration system, so any water that is sprayed is filtered for particulates before the water is drained. During the time of inspection, all the garage doors were open at this site.

This facility operates two enclosed downdraft paint booths (brand: Garmat) that are located next to one another on the north side of the shop. These paint booths are used to paint cars and car parts that have come in for repair. According to Sean, they average 10 – 25 jobs monthly between both booths and only automobiles are painted in these booths (e.g., no buses or earth moving equipment). At the time of inspection, only automobiles were observed in the shop and in the paint booth in use. Sean explained that painting is done with water-based paint, and they have not changed their paint supplier or any materials since their last inspection as they have a national paint contract for all Caliber Collision shops. He also explained that no solvent-based paint is used at this facility and no paint thinner is used to thin paint for application to cars or car parts. I observed that all paint at this facility was water based at the time of inspection.

Most paint is stored and poured in a dedicated paint room. I observed all paint containers to be closed in the room. Extra paint is stored on a shelving unit outside the paint room, where all containers were also observed to be closed. Dave explained that paint usage is calculated for each

job using a scale attached to a computer, which logs the weight of all paints used in grams. Caliber Collision keeps track of paint usage to manage paint inventory and determine how much paint is used per job as it affects the price of their services. Daily paint usage records were provided by Caliber Collision from 1/6/2023 until 5/30/2024 show that less than 2 gallons of paint are used per day the booths are operated. The booths are not used every day. The highest total monthly paint usage was 40.83 gallons in December of 2023. The total amount of paint used from 1/6/2023 – 5/30/2024 was 253.33 gallons. According to these records, the monthly paint usage at this facility is less than 200 gallons of paint per month.

The booth located farther east (closest to the road) is their main booth. Sean stated the other booth is only used when they are very busy. During our inspection, the main booth was in use, but the job was paused so we could examine the booth. Each booth is equipped with intake and exhaust filters that are changed as needed, typically about once a month (sooner if they are busier). The main paint booth is equipped with two sets of fiber filters (air is filtered as it goes in and as it comes out) that can be easily accessed through two doors on the side of the booth. The other paint booth has two similar sets of metal filters located in the back of the booth which are not as easily accessible. The metal filters in this booth are washed out when the fiber filters on the booth are changed. Even though this booth is used less frequently (it was not being used at the time of our inspection), it is harder to check the state of the metal filters frequently, so they are assumed to be dirty when the fiber filters need to be changed. Both booths also have fiber filters along the ceiling of the booth which are changed as needed. As these are downdraft booths and air is pulled down and away from the ceiling of the booth, paint and other particulates are rarely collected by these filters. The filtered exhaust from both booths is vented outside. Both booths have also just been updated with new fire suppression systems within the last few weeks according to Sean.

These paint booths both use less than 200 gallons of paint per month and have exhaust systems with dry filters installed that are maintained and operated in accordance with the manufacturer's specifications. Additionally, monthly coating use records are maintained on file for the time period they stated they began operations at this location to present, and the monthly coating records were provided upon request. Therefore, both booths are exempt from the requirement to have a PTI under R 336.1287(2)(c)(i-iii). Additionally, as Caliber Collision is an auto body shop that is almost entirely for collision repairs, does not paint anything but automobiles, only has two bays devoted to painting, and does not do more than 50 jobs a week. According to the Potential to Emit (PTE) Guidance for Specific Source Categories memorandum issued on April 14, 1998 by the EPA (Table 4A) and the information gathered during this inspection, Caliber Collision is a minor source without additional limits and does not require a PTI nor Title V permit.

This facility may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources promulgated in 40 CFR Part 63, Subpart HHHHHH. However, compliance with NESHAP Subpart HHHHHH was not evaluated during this inspection because EGLE AQD has not requested delegation of authority to implement and enforce this NESHAP.

A car or car part is sanded before it is painted. The sander used at this facility is equipped with a vacuum which pulls the air through a filter before the air is released back into the shop. The filters from this process are stored in an appropriately labeled waste barrel before they are properly


disposed of. As this equipment has emissions that are released only into the general in-plant/in-facility environment, this equipment and process is exempt from the requirement to have a PTI under R 336.285 (2)(vi)(A-C).

The paint sprayer is washed with Safety - Kleen cold cleaner, which thins any paint in the lines and sprayer. The cold cleaner is equipped with a filter for particulates. After the cleaning solvent has been used, it is stored in an appropriately labeled waste barrel until it is properly disposed of. The lid of the cold cleaner was closed, and the instructions were conspicuously posted in compliance with R 336.12707. The opening of the cold cleaner is less than 10 ft<sup>2</sup>, so this equipment and process is exempt under R 336.1281.

There is one boiler at this facility that has a heat input 36,000 BTU/hour. As it is used to provide hot water to the facility, is under 50,00,000 BTU/hour and runs on natural gas, the boiler is exempt from the requirement to have a PTI under R 336.1282 (b)(i). This boiler is less than 10 MM Btu/hour, so it is not subject to 40 CFR Part 60 Subpart Dc. This boiler runs on natural gas and per 40 CFR 63.11195(e) is not subject 40 CFR Part 63, Subpart JJJJJJ.

### Compliance Determination

Observations made during the inspection and record review indicate that Caliber Collision is operating in compliance with all 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 

DATE 6/10/2024

Supervisor 