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

B457249918

FACILITY: GORDON CHEVROLET		SRN / ID: B4572
LOCATION: 31850 FORD ROAD, GARDEN CITY		DISTRICT: Detroit
CITY: GARDEN CITY		COUNTY: WAYNE
CONTACT: Steve Tesner , Paint Shop manager		ACTIVITY DATE: 07/19/2019
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Paint Spray Booth Operation		
RESOLVED COMPLAINTS:		

SCHEDULED INSPECTION

Gordon Chevrolet, Inc (GCI).

INSPECTOR: Terseer Hemben EGLE-AQD

PRESENT: Steve Tesner GCI

Date of Inspection: July 19, 2019

SRN: B4572

Address: 31850 Ford Road, Garden City, MI 48135

Regulatory Rules:

Federal-40 CFR 63, Subparts HHHHHH (6H)

State: R 336.1201; R 336.1287(c), R 336.1910; R 336.1901.

FACILITY BACKGROUND: A Spray-Painting Process.

The Gordon Chevrolet Inc. (GCI) operates an auto dealership with an onsite spray paint booth system at the 31850 Ford Road, Garden City, Michigan. The spray paint process involves sanding, priming and coating of metal surface with a water-based coating. This process decorates the finish and body-looks of the automobile. GCI installed and operates two booths at the site. The business operates five days in a week for 10-11 hours per day. Historically, the facility was permitted by the Wayne County Department of Environment and Health to install and operate the 2 booths and 2 ovens. The installation included a downdraft system with stacks serving the 2 booths. Completion and commissioning of the system was made in 1993. Since that time the facility chose to void the permits and operate each booth under the Rule 287(2)(c) exemption as applied.

INSPECTION NARRATIVE

I arrived at the GCI facility on July 19, 2019, at 1120 hours. The purpose of visit was to conduct a compliance inspection. Temperature at the hour was 88 F with windspeed 13 mph, and humidity 68%. I was admitted onto the facility by Mr. Steve Tesner. We conducted a pre-inspection interview. Mr. Tesner informed there had been no change made to the coating equipment or process since the 2018 inspection. We proceeded to tour the paint spray booth, ovens, and duct-stack areas. We returned to the office for post inspection conference. Steve presented the paint use and purchase records, paint spray booth maintenance records including filter replacement and waste management activities. The facility and process were maintained through contract management. I received copies of records extracted from recordkeeping files [Attachment A, pgs. 1-29].

COMPLAINT/COMPLIANCE HISTORY:

None

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING VNs:

None

SCHEDULE/PRODUCTION RATE:

The facility operates a one 10-11-hour shift from Monday to Friday depending on production load.

PROCESS DESCRIPTION:

The GCI facility was originally permitted by the Wayne County Department of Air Pollution Control and Health, but now operates 2 spray paint booths and gas fired ovens as allowed by the Rule 287(2)(c) exemption. Controls for the process are built into the equipment and process. The spray paint booths have dry filters with cross draft and downdraft pressure that pulls gases into the fabric filters. The filters have removal efficiency 99.8%. The guns have delivery efficiency above 75%. The detail on the coating process is in AQD files [Attachment A, pgs. 8-10]. The coatings are water-based with minimum VOC content.

GCI proved the facility does not use chemicals to strip paint from auto parts, hence the coating process is methylene chloride free. The methylene chloride-free state of the process supports the exempt status of federally 40 CFR 63, Subpart 6H following the demonstrations to EPA's satisfaction that the process applied no coatings containing targeted hazardous air pollutant (HAP) [Attachment A, pgs. 1-2]. Auto parts are surface-sanded and washed with aqua-based detergents for the coating process. Emissions from the metal precleaning processes are discharged in in-plant environment and covered under exempt Rule 285(2)(l)(vi)(B). Surface finished metal parts are set in the booth for spray painting. Gaseous exchange during the painting process with the ambient air takes place through the fabric filters and ducts that discharge into the twin stacks. Spent filters are regularly removed and disposed through waste management contractors [Attachment, Pgs. 10-29].

APPLICABLE RULES/ NESHAP CONDITIONS:

The operations of GCI facility were evaluated as: -

Rule 201 (1) – GCI operated under the Rule 287(2)(c) and Rule 285(2)(l)(vi)(B) exemptions for each of the 2 spray booths, associated ovens and metal precleaning. Mr. Tesner stated there had been no change or modification of equipment or process at the facility [Attachment A, pg. 3]. The facility operated in compliance with the exempt rules.

GCI submitted all paints purchased and used. Records submitted indicated the paint use was less than 200 gallons per month. Records submitted by GCI indicated the facility used 280.24 gallons of paint and solvent between 7/1/2018 and 6/30/2019 (12 months). This averaged 23.35 gallons per month. [Attachment A, Pgs. 4-7-see shaded coating products list]. Records regarding emissions monitoring were maintained for at least 5 years for examination by the AQQ.

GCI stated the company had a set quantity of paint in credit line with the paint supplier.

The paint supplier delivers the set number of gallons of paint per month to replace the quantity used. The quantity of paint delivered did not exceed 200 gallons per month based on the paint usage in calculations. [Attachment Pgs. 4-7].

GCI maintained the Tekna Gravity spray paint booth gun, DEVILBISS certified filters and associated equipment in a satisfactory manner. Visual inspection indicated the guns used for spraying the paint were washed and stored in a trough located in the booth area, and spent filters were changed and disposed offsite through contractor arrangements [Attachment A, Pgs. 8-29].

GCI managed all wastes generated from painting processes and disposed in a satisfactory manner through a contractor. Wastes packed in a 55-gallon drum is picked up by the contractor along with the spent filters for disposal off the site [Attachment A, Pgs. 3-15].

GCI presented a letter from USEPA Region 5 stating that the operations at the facility were exempt from the Subpart 6H regulation provided that the information provided to EPA is and remains accurate [Attachment A, Pgs. 1-2].

GCI presented the technical information qualifying the DEVILBISS spray guns used in spray coating had an efficiency of 98% or equivalence of HVLP or equivalent technology [Attachment A, Pg. 8].

GCI operated the spray booth that was properly installed with quality filters and operated in a satisfactory manner. Information regarding the equipment was obtained in a previous inspection and is in AQD files [Attachment A, Pgs. 9-29].

GCI maintained and kept the MSDS information for paints used for coating. The document was kept and maintained on site for examination by the EGLE-AQD. The SDS examined during the inspection is same as those already on file. No additional chemical products requiring maintenance of SDS was added to the paint inventory [Attachment A, Pgs. 4-7].

GCI discharged the exhaust gases from coatings vertically unobstructed through the stacks to the ambient air. Visual inspection of ducts, stack and external discharge point confirmed the compliance operation of the stacks.

REGULATORY DISCUSSIONS

MACT, Subpart 6H: The facility is exempt from MACT, Subpart 6H reporting. GCI provided a letter dated May 4, 2012 from the USEPA Region 5 stating that the operations at the facility are exempt from Subpart HHHHHH so long as the activities remain the same [Attachment A, Pgs. 1-2].

Rule 910: GCI Fabric filters were properly installed, maintained, replaced and disposed in a satisfactory manner.

Rule 301: There was no visible emission coming out of the stacks at the time of the inspection.

Rules 901: There were no unusual odors or complaints associated with the facility at the time of the inspection.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

This facility did not have nor needed a fugitive dust plan.

FINAL COMPLIANCE DETERMINATION:

The inspection of Gordon Chevrolet Inc. facility and review of record keeping determined the GCI operated the spray paint booth in compliance with the paint chemical stripping free process and recordkeeping. The facility complied with the exempt Rule 287(2)(c) and exempt rule 285(2)(I)(vi)(B). The facility operated tight sealed spray booths with automatic pressure balance system for emission controls.

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DATE 8/20/2019 SUPERVISOR JK