

B5871  
MANILA

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

B587148060

<b>FACILITY:</b> USA Collision & Repair		<b>SRN / ID:</b> B5871
<b>LOCATION:</b> 6734 West Warren, DETROIT		<b>DISTRICT:</b> Detroit
<b>CITY:</b> DETROIT		<b>COUNTY:</b> WAYNE
<b>CONTACT:</b> Mike Vertolei , Leadworker		<b>ACTIVITY DATE:</b> 08/23/2018
<b>STAFF:</b> Gerald Krawiec	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled Inspection for FY 2018 and Complaint Investigation		
<b>RESOLVED COMPLAINTS:</b>		

AQD staff conducted a scheduled inspection for FY 2018 of USA Collision & Repair, located in the City of Detroit. The purpose of the inspection is to determine the facility's compliance with applicable state and federal air pollution rules and regulations. Business Owner, Steve Jelsch is not available, therefore Shop Leader, Mike Vertolei accompanied AQD staff on the inspection.

Background:

Since at least 1985 there has been an automobile collision/body shop at this location. WC Certificate of Operation APC. 5-09655 without conditions was issued on 4/3/1989.

Complaint History:

The file shows 6 citizen odor complaints received between 2016 – 2018. There were 3 different persons alleging odorous emissions. All complaints were investigated without verification of a Rule 901 violation. 2 citizens live on Sparta street which is directly behind USA, the 3rd person did not leave an address.

Process Description:

USA Collision & Repair operates an automobile/truck body repair shop with a paint spray booth and body workshop. The facility repairs or replaces damaged body parts and/or prepares automobile body parts for painting using a high transfer efficiency paint spray gun. Painted parts are kept in the paint spray booth for curing. Painting is not a continuous operation and most of the time small parts and vehicles are found in the booth. The booth is a side draft design with 2 banks of filters 1 bank in each corner of the booth on the back wall from the floor to the ceiling of the booth. Each bank of filters is exhausted through ductwork into a single stack that goes through the roof of the building. Filters are regularly changed by USA.

Dirt and dust created by pounding, grinding, sanding or other body repairs are contained within the building. The shop floor is swept as needed. There is also a paint mix/storage area.

Inspection Narrative:

Prior to this inspection odor surveillance was conducted on 8/9 and 8/23 without odor detection.

Shop Leader, Mike Vertolei accompanied AQD staff as we walked through the shop to the paint spray booth. The paint spray booth did not have any parts in it. A few hours earlier the rear quarter panel of a car was painted. That paint application would have taken approximately 20 - 30 minutes. The vehicle remained in the booth till dry which took about 3 hours. There is not any additional painting scheduled for today. The booth is very old but in fair condition, some paint filters were missing, Mr. Vertolei replaced them immediately. The fan was started to demonstrate the booth is operational. Whole cars are seldom painted, mostly small parts such as bumpers and fenders or quarter panels are painted and applications like these take normally 20 – 30 minutes at a time. The short duration of time that paint spraying is occurring makes it difficult for an inspector to be in the area at exactly the right time to perform an odor observation.

Dirt and dust created by pounding, grinding, sanding or other body repairs are contained within the building. The shop floor is swept on an as needed basis and is clean at this inspection. This reduces the chance of fugitive dust or dirt track-out escaping from the building.

There is a paint mix/storage area

We stepped outside of the building and went around the back of the building, I pointed out to Mr. Vertolei how the overgrown trees are approaching the top of the stack and obstructing the free vertical flow of the gases being exhausted. This obstruction of free flow could contribute to possible odor complaints. He stated that he had no idea this was happening as nobody ever comes back here and would discuss trimming these trees with the owner. Vegetation in the back of this building is wildly overgrown.

An opacity observation was not performed since the spray booth was not in operation.

#### Post Inspection:

After returning to the office, I asked to review paint purchase and/or usage records. Records of coating usage is not available although it is unlikely that USA exceeds 200 gallons/month. Mr. Vertolei estimates 15 – 20 gallons of paint and solvent is used on a monthly basis. USA office staff had no idea what I was talking about.

Therefore, I explained that records of the coating used must be maintained on a monthly basis and that in future inspections that information may be required. I attempted to explain the Rule 287(2)(c) exemption but was not successful. In addition, I informed them of the DEQ website where they can find more information on this rule and left the USA staff with a copy of the DEQ AUTO BODY SELF-AUDIT WORKBOOK and a copy of the monthly Record Keeping Form.

USA staff stated that only the owner would know how to access this information and that it would be best to wait for his return. Steve Jelsch, the Owner lost a family member and is on an extended bereavement leave. It is not known when he will return to work.

This information can be reviewed later, when it is available or at the next inspection.

#### Regulatory Summary:

Rule 287(2)(c) of the Michigan Air Pollution Control Rules exempts surface coating operations (paint spray booths) from the Permit to Install program if certain conditions are met. This Rule applies to this facility.

Operations that generate dirt and dust created by pounding, grinding, sanding or other body repairs are exempt under Rule 285(2)(l)(vi)(B) because those particulates are contained within the building. The shop floor is swept on an as needed basis preventing fugitive emissions from escaping the building.

#### Compliance Determination:

Based upon this inspection of USA Collision & Repair, it appears this facility is operating in compliance with the applicable air quality rules and regulations that were evaluated.

NAME



DATE

4/5/19

SUPERVISOR

JK