

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

B716131552

FACILITY: Penske Vehicle Services		SRN / ID: B7161
LOCATION: 1225 E MAPLE, TROY		DISTRICT: Southeast Michigan
CITY: TROY		COUNTY: OAKLAND
CONTACT: Justin Fragnoli , Strategic Analyst Business Planning		ACTIVITY DATE: 06/24/2015
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection; follow up to January 13, 2015, inspection.		
RESOLVED COMPLAINTS:		

On June 24, 2015, I conducted a scheduled inspection of Penske Vehicle Services (Penske) located at 1225 E. Maple Road, Troy, Michigan. The purpose of this inspection was to determine the facility's compliance 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 PA 451, as amended (Act 451); the administrative rules; the conditions of General Air Use Permit to Install (PTI) No. 279-05.

This facility has been uniquely identified by the Air Quality Division (AQD) with the State Registration Number (SRN) of **B7161**.

This facility was purchased by Penske Vehicle Services (Penske) on July 1, 2014. The AQD became aware of this transition on January 8, 2015. On January 8, 2015, I sent an email to the Penske Vehicle Services management team in which I identified three timely compliance issues;

- Change of ownership notification,
- Recordkeeping per PTI 279-05, and
- The MAERS report due March 15, 2015.

On February 9, 2015, a change of ownership notification was received by the AQD wherein Penske stated that the terms and conditions of PTI 279-05 were understood and accepted.

Regarding MAERS reporting, because the facility had limited surface coating activity in 2014, I contacted the MAERS team and requested that the first MAERS report to be submitted by Penske Vehicle Services should be for the 2015 reporting year, which will be due by March 15, 2016.

Before entering the building, I drove along the east side of the building where the exhaust stacks for the High-Bake surface coating line are located. A limited visual inspection appeared to indicate the exhaust stacks were in proper operating condition. I heard the sound of the exhaust system in operation. It was later confirmed during this inspection that the exhaust system was working but no surface coating was in process. This appears to be an industry practice, which is intended to limit finish defects caused by dust accumulation that occurs when leaving the exhaust system idle for extended periods.

I entered the site, met with Mr. Justin Fragnoli, Strategic Analyst Business Planning; and Mr. Jason Cadzow, Paint Manager. I presented photo identification and explained the purpose of

the inspection and began the inspection by observing the emission units. Mr. Fragnoli and Mr. Cadzow were present throughout the inspection. Mr. Matt Witmer, Quality Inspector, was also present during most of the inspection.

PTI 279-05

PTI 279-05 was approved in 2006 when the facility was owned by Saleen Special Vehicles, Inc. This permit approved the use of three down draft spray booths in the West Bay as well as three down draft spray booths and a high-bake surface coating line in the East Bay. Although each subsequent facility owner provided similar surface coating services of automotive parts and vehicles, Penske is unable to correlate the name of each permitted emission unit (or flexible group) with the physical location of each emission within the facility. Therefore, Penske is unable to quantify the emissions from each emission unit and hence comply with the permit required recordkeeping.

Regardless of the inability of Penske Vehicle Services to identify individual emission units or flexible groups, the emission records provided during this inspection appear to indicate that the facility-wide emissions have not exceeded the permitted emission limits of any individual emission unit. Therefore it appears that Penske Vehicle Services has not violated any of the permit VOC emission limits. Furthermore, if one assumes that all of the VOC emissions were 100% HAPs, the emission records for the whole facility appear to indicate that neither the individual nor aggregate HAP emission limits were exceeded.

Nevertheless, because Penske Vehicle Services' inability to identify individual emission units or flexible groups, the permittee was unable to present records that comply with permitted recordkeeping conditions. Therefore Penske Vehicle Services is has failed to comply with the recordkeeping conditions per PTI No. 279-05, Special Conditions 1.9, 2.9, 2.10, 3.9, 3.10, 4.6, 5.6, 6.6, 7.4d, and 7.4e. A violation notice was issued on July 7, 2015, which identifies these noncompliances.

NAME



DATE

9/30/15

SUPERVISOR

CTE