

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

B716134918

FACILITY: Penske Vehicle Services		SRN / ID: B7161
LOCATION: 1225 E MAPLE, TROY		DISTRICT: Southeast Michigan
CITY: TROY		COUNTY: OAKLAND
CONTACT: Justin Fragnoli, Program Manager		ACTIVITY DATE: 04/22/2016
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Self-initiated inspection.		
RESOLVED COMPLAINTS:		

On April 22, 2016, I conducted a self-initiated 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. 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.

I entered the site, met with Mr. Justin Fragnoli, Program Manager. I presented photo identification and explained the purpose of the inspection and began the inspection by observing the emission units. Ms. Jill Lajdziak, President & CEO, took the time to meet with me during of this 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 (now identified as the **Mechanical Operations (MO) assembly area**). Also permitted in the East Bay are three double-wide down draft spray booths (now identified as the **Paint Operations Refinish (POR) booths**) and two **Hi-Bake surface coating lines**. During the inspection of June 24, 2015, Penske was unable to identify each emission unit and therefore was not able comply with all permit required recordkeeping. Since the inspection of June 24, 2015, Penske was able to determine the identity of each emission unit with respect to the PTI and had corrected recordkeeping in accordance with permit conditions. Hard copies of the updated recordkeeping are attached to the printed activity report. Per a review of recordkeeping related to this inspection, it appears that Penske has satisfied the permit requirements and has addressed the non-compliances identified in the violation notice dated March 1, 2015.

During this inspection, Mr. Fragnoli agreed to label each emission unit according to the new names we developed during this inspection. The new emission unit names reflect current nomenclature used by Penske and are expected to be used in the pending PTI modification. Mr. Fragnoli agreed to complete this task by Friday, May 6, 2016.

It is important to note that two of the three permitted West Bay (Mechanical Operations (MO) assembly area) spray booths had been removed before Penske purchased the facility on July 1, 2014. During the inspection of April 22, 2016, I observed that two new down-draft spray booths had been installed where the previous spray booths had been removed. I discussed compliance options to operate these spray booths with Mr. Fragnoli and Ms. Lajdziak. I explained that the spray booths could be operated per the R287(c) exemption from R201 as long as the total VOC and HAP emissions per PTI 279-05 were not exceeded. We also discussed the option to modify PTI 279-05 to include the two new spray booths. Ms. Lajdziak expressed the preference to have PTI 279-05 modified before the new MO booths are operated. An air use permit application to modify PTI 279-05 was received by the AQD on April 13, 2016 and is pending additional information as well as comments on the draft from Penske before approval.

During the inspection of the MO booths I observed some gaps in the placement of particulate filters, which would allow some exhaust and particulates to bypass the control media. I discussed these deficiencies with Mr. Fragnoli and informed him that repeat observations may result in a violation notice.

Penske does not use the paint mix room and piping system associated with the HiBake line. Therefore, the permittee does not need to purge the HiBake line paint system. All surface coating is applied with HVLP spray guns, which are cleaned in spray gun cleaning station. The purge solvent is then reclaimed in an automated still within the cleaning station. Mr. Fragnoli and I discussed the need to track purge solvent emissions, which I expect to be much less than purge solvent use associated with the HiBake coating lines. I will evaluate compliance with tracking solvent emissions during the next inspection.

CONCLUSION

Penske Vehicle Services appears to be in compliance with all evaluated permit conditions.

NAME



DATE

6/13/16

SUPERVISOR

CJE