

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

M366344404

FACILITY: Arnold Automotive Group		SRN / ID: M3663
LOCATION: 29000 Gratiot Avenue, ROSEVILLE		DISTRICT: Southeast Michigan
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Brad Michels, General Manager		ACTIVITY DATE: 05/04/2018
STAFF: Kerry Kelly	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection		
RESOLVED COMPLAINTS:		

On May 4, 2018, I Kerry Kelly, MDEQ-AQD, conducted an unannounced inspection at Gerber Collision and Glass located at 29187 Gratiot, Roseville, Michigan. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and Permit to Install (PTI) No. 543-92.

I arrived at the facility at approximately 1:15 PM, entered the Customer Service Office and identified myself to a member of the office staff. This staff member introduced me to Mr. Bradley Michels, General Manager. I introduced myself to Mr. Michels, showed him my credentials, and explained the purpose of my visit. Mr. Michels assisted me during the inspection.

PTI 543-92

PTI 543-92 was issued to Arnold Automotive Group LTD on January 29, 1992 for two automotive refinishing booths.

FACILITY OVERVIEW

Operations at the Gerber Collision and Glass include auto body repair.

INSPECTION

Mr. Michels showed me the two spray paint booths located at Gerber and stated these were the same booths as when Arnold Automotive owned the facility. In the spray booth area there was an enclosed gun cleaner. I inspected one of the paint booths, the other booth was in curing mode and could not be inspected as a result. The filters in the paint booth I inspected were properly installed as required in PTI 543-92 SC 18.

Special Condition (SC) 14 limits the VOC emission rate from the two paint booths combined to 7.7 tons/hour and 8 tons/year. Records of VOC emissions are not required in PTI 543-92. Based on the permit evaluation, the hourly emission rate is derived from a usage rate of one gallon per hour and the product with the highest VOC content used in the booths. At the time of permitting the highest VOC content of products used was 7.7 lbs/gal. Currently, the product with the highest VOC content used at this Gerber location is lacquer thinner (approximately 6.73 lbs/gal). The yearly VOC emission rate, based on the permit evaluation, is demonstrated through yearly material limit of 2080 gallons specified in SC 17. Mr. Michels provided records of the gallons of coating and cleaning products used in both spray booths, as required in SC 17, for 2017 (attachment 1) and product data sheets for the coatings used (attachment 2). Based on these records, the total amount of coating and solvent used in 2017 was 305 gallons.

SC 15 of PTI 543-92 requires the process be operated with no visible emissions. I inspected both stacks for the paint booths and did not see any visible emissions.

SC 19 requires the exhaust gases from the paint booths be discharged unobstructed vertically upwards to the ambient air. I inspected the stacks at Gerber and noted there was a bend at the top of each stack diverting the exhaust gases horizontally. I brought this to Mr. Michel's attention and he stated in an email (attachment 3) that he would address the issue and would inform me when the new top pieces of ductwork arrive. A violation notice for SC 19 for failure to ensure exhaust gases are discharged unobstructed vertically will not be issued at this time because it appears Mr. Michel's is addressing the violation. The stack height and cross sectional size requirements in SC 19 were not evaluated.

In addition to the paint booths, there is one cold cleaner and some welding equipment. The cold cleaner was empty and, according to one of the mechanics, is rarely if ever used. The solvent/air interface is approximately 4 square feet, the lid was closed, and Mr. Michels posted the operating instructions on the front. It appears the cold cleaner is exempt from the requirement to obtain a permit to install per Rule 281(2)(h) and appears to meet the requirements in Rule 707. It appears the welding equipment is exempt from the requirement to obtain a permit to install per Rule 285(2)(i).

CONCLUSION

Based on the inspection, Gerber appears to be in violation of SC 19 which requires exhaust gases be discharged unobstructed vertically into the ambient air. A violation notice will not be issued at this time because the company appears to be taking steps to resolve the violation.

NAME

R. Kelley

DATE

5/18/18

SUPERVISOR

Joyce J.