

m.

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

N321035013

FACILITY: Hank Graff Chevrolet		SRN / ID: N3210
LOCATION: 800 N State Road, DAVISON		DISTRICT: Lansing
CITY: DAVISON		COUNTY: GENESEE
CONTACT: Danny McClure , Assistan Body Shop Manager		ACTIVITY DATE: 06/15/2016
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self initiated inspection in conjunction with complaint investigation.		
RESOLVED COMPLAINTS:		

Inspection Report

N3210- Hank Graff Chevrolet
800 N. State Road, Davison, Michigan 48423

Inspection Date:

6/15/16

Facility Contacts:

Danny McClure, Body Shop Assistant Manager, 810-6542334, dmcclure@hankgraff.com

MDEQ AQD Personnel:

Nathan Hude – huden@michigan.gov, 517-284-6779

Facility Description:

Hank Graff auto dealership with new and used vehicles, including a body shop with 3 paint booths and 4 prep stations for dent repair and bondo work.

Applicable Regulations:

-Originally believed to be Rules 285(l)(vi) and 287 (c) but after the inspection I found that the site has PTI 953-91 -40CFR63 HHHHHH- Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, does apply per paragraphs 63.11169(b) and 63.11170(a)(2), yet delegation to the state of Michigan has not been given by US EPA

40CFR63 llll does not apply due to not being a facility that coats "new automobiles or new light duty truck bodies" per paragraph 63.3081(b)

40CFR60 MM does not apply due to the facility not being a "automobile or light-duty truck assembly plant" per paragraph 60.390(a).

Previous Inspections:

none

Previous Violations:

none

Violations Found During this Inspection including reoccurring:

PTI 953-91 Special Conditions 17. Applicant shall not use more than 291 gallons of coating and reducer per calendar month. A calendar month record of the coating and reducer usage shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. And 18. The volatile organic compound emission rate from the paint booths shall not exceed 15 pounds per hour nor 9 tons per year.

Recent Complaints (within 2 years):

Complaint No C-16-01644 (see investigation for further details)

MAERS Reporting

none

MAERS Emission Unit List

none

Inspection Summary

Note: This inspection was conducted using exemptions as a reference without prior knowledge of an existing permit for spray booths, PTI 953-91. It was only after returning to the office on the next day that the permit was found to be active.

I arrived at the body shop as part of a complaint investigation. During the investigation I discovered that a paint booth was installed in the body shop. The inspection consisted of the body shop.

I provided Danny a copy of the Inspection Brochure and my business card while I informed him of the purpose of my visit. We discussed the brochure contents and asked if he had a permit to which he replied that he was unaware of one (while in the office I was unable to find one associated with the site). Thinking that a permit was not applicable, Danny and I reviewed applicable exemption rules. I explained rules 285(l)(vi) as it pertained to their prep area where dents are repaired and bondo grinding is completed; we also reviewed rules 287(c) as it pertained to their paint booths. We discussed the record keeping requirement for 287(c); Danny was unaware of any sort of record keeping being completed but engaged the Office Manager Shelly to assist in looking up records while we toured the facility.

Prep Area (Dent Repair, Grinding Area)

Rule 285(l)(vi) does not have record keeping requirements, meets the rule with filtered yet externally vented emissions. There are four prep stations that are separated by plastic type curtains. All stations have vacuum hoses hooked up to the grinders and ventilation that is pulled in from the floor with fresh air inlet above the station. The floor has a fabric filter installed and the air handling unit has another fabric filter, Danny stated there was a third filter in the stack, but I did not confirm this. The filters for these booths are changed by an outside contractor who is in charge of all air control maintenance. The filters in the floor are changed once per month, the filter in the air handlers and in the stacks are changed twice per year.

Paint Booth Area

Rule 287(c) requires record keeping and particulate control. The facility has three separate paint booths orientated north to south with the northern booth being the oldest. These paint booths are set up similar to the prep area (though are walled with overhead doors) with the particulate control filters in the floor, in the air handler, and in stack (stack not confirmed visually). Maintenance was similar to the prep area as well using the same outside contractor; the filters in the floor are changed once per month, the filter in the air handlers and in the stacks are changed twice per year.

The paint room was a small room where the paint is mixed to specific quantities per color matching requirements. I would estimate that the room maybe contained a maximum of 400 gallons of paint given the quantity of quart sized containers and 50 gallon drums.

Danny and I returned to the office where we discussed the record keeping requirement. 287(c) has record keeping requirements as the following:

- (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
- (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

These requirements were not being met from what Danny and Shelly could find, though Danny wanted to check with his boss Larry before we confirmed this. I informed Danny that due to the lack of records, a violation for the rule would most likely be cited but I would wait until he was able to check with Larry prior to moving forward (Larry was out that day but due to return 6/16).

I departed the facility after completing a closing meeting with Danny on my findings; overall, the body shop was very clean and all filters inspected looked to be recently installed and well kept, yet the lack of record keeping would result in a violation if records could not be produced. We set a reasonable deadline of Friday to have the records submitted if kept.

On 6/16/16, Danny contacted me and stated that he had been able to determine paint use through the facilities orders from the paint supplier. On the phone Danny stated that the usage (order) since January of 2016 was a total of 91 gallons. I requested him to send a copy of this proof and the previous 2 years' worth of data along with a written statement claiming the ordered amount equaled the usage amount. Danny agreed to do so with the intent to email the information once complete. While waiting, I began to type up this report. While gathering all pertinent information, I found that the facility has an active permit, PTI 953-91.

PTI 953-91 was issued on December 20, 1991 and amended on April 7, 1992. There are 6 Special Conditions of the permit numbered 14-19. Special Conditions 17 and 18 require record keeping per the following:

17. Applicant shall not use more than 291 gallons of coating and reducer per calendar month. A calendar month record of the coating and reducer usage shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

18. The volatile organic compound emission rate from the paint booths shall not exceed 15 pounds per hour nor 9 tons per year.

I called Danny at approx. 3:24pm and informed him about the valid permit. I explained to him that due to the requirement of records to be kept and the lack there of, I would be issuing a violation for lack of documentation.

Throughout our meeting during the onsite visit, I asked Danny to share the exemption information to his fellow body shop managers as there are multiple Graff dealerships throughout the state. While performing research through permit cards, I found that under the Graff name the following permits were on file with the DEQ:

1. PTI 370-94, Graff Chevrolet, Inc., 3636 E. Wilder Rd, Bay City, PAINT SPRAY PREP STATIONS, SRN: N5021
2. PTI 369-94, Graff Chevrolet, Inc., 3636 E. Wilder Rd, Bay City, SPRAY BOOTH, SRN: N5021
3. PTI 697-93, Graff Chevrolet, Inc., 3636 E. Wilder Rd, Bay City, WASTE OIL FURNACE, SRN: N3782
4. PTI 690-92, Graff Motor Sales, Inc., 1100 W. Cedar Ave, Gladwin, PAINT SPRAY BOOTH, SRN: N3783
5. PTI 689-92, Graff Chevrolet, Inc., 3636 E. Wilder Rd, Bay City, PAINT SPRAY BOOTH, SRN: N3782
6. PTI 953-91, Hank Graff Chevrolet., 800 N. State Rd, Davison, PAINT SPRAY BOOTHS, SRN: N3210

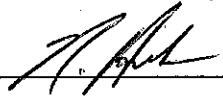
This list of permits was provided to Danny via phone voicemail and email on 6/17 so that he may distribute to the applicable managers. I informed him that should they not be able to locate a copy of the permit in their records that I would send copies via email.

Based on this inspection, violations for the following conditions were sent:

Applicant shall not use more than 291 gallons of coating and reducer per calendar month. A calendar month record of the coating and reducer usage shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request. During this inspection, Hank Graff Chevrolet representatives were unable to produce paint and reducer usage records. Based on this, it is assumed that records of paint usage have not been maintained and are unavailable.

18 states the following: "The volatile organic compound emission rate from the paint booths shall not exceed 15 pounds per hour nor 9 tons per year." Records of emission calculations have not been kept, nor have they been computed in order to determine compliance with this condition.

NAME



DATE

6/17/16

SUPERVISOR

