

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

N338741343

FACILITY: Truck Collision Services, Inc.	SRN / ID: N3387
LOCATION: 16260 Felton Road, LANSING	DISTRICT: Lansing
CITY: LANSING	COUNTY: CLINTON
CONTACT: Ray Chatfield , Owner/Manager	ACTIVITY DATE: 08/15/2017
STAFF: Julie Brunner	SOURCE CLASS: MINOR
SUBJECT: Inspection for compliance with PTI 276-92	
RESOLVED COMPLAINTS:	

On August 15, 2017, I conducted a self-initiated inspection of Truck Collision Services, Inc. (TCS) in Lansing. This facility has never been inspected.

Facility Address:

16260 Felton Road, Lansing, Michigan 48906

Facility Contact:

Mr. Ray Chatfield, Owner/Manager, 517-886-4510, rchatfield@ameritech.net

Facility Description:

TCS is a truck collision repair shop that repairs semi-trucks that have been in accidents. The facility has metal surface grinding equipment, welding, fabrication, sandblasting, and a large paint booth for full service body repairs. TCS has two locations, one in Lansing and another in Gaylord.

TCS is located in northwest Lansing in an industrial/commercial area west of the Royal Scott Golf Course. The area surrounding the plant is mixed use with some residential housing to the north, a farm field to the east, and commercial/industrial properties to the south and west.

Commencement of Mfg. Operations: 1990

Plant Capacity: Currently expanding the building space

Emergency Generators? None, power provided by Consumers Energy

List of Active Air Use Permits:

PTI 276-92 for a 70' long by 20' wide and 16' tall dry filter paint spray booth.

Regulatory Review:

The facility is a minor source of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program.

Michigan Air Emissions Reporting System (MAERS):

The facility is not required to report emission information to MAERS.

Inspection:

Arrived: 10:18 AM

Departed: 11:11 AM

Weather: 69°F, calm, UV 3 Moderate

No visible emissions (VEs) were observed from any of the facility exhaust stacks upon arrival. No odors were identified surrounding the facility.

I met with Mr. Ray Chatfield (Owner/Manager). The purpose of my visit and the status of the facility operations were discussed. He had never been inspected since he obtained the permit for the spray paint booth in 1992. They are currently enlarging the building that includes the permitted spray paint booth. A facility tour was taken followed by a records review. The facility includes the following:

- A 20' x 70' spray/bake paint booth (PTI 276-92)
- A 30' x 80' abrasive blasting booth (able to blast with different products including plastic, sand, aluminum oxide, walnut shells, and soda).

- Body repair bays
- Trailer repair bays
- Beeline frame correction press
- Beeline frontend/rearend alignment machine
- Welding (permit exemption Rule 285(2)(i))
- Surface grinding
- Parts and scrap storage
- Administrative offices

There is hand-held grinding done in the bays including surface grinding tables with HEPA filters. All internally vented and exempt from permitting per Rule 285(2)(l)(vi)(B).

The abrasive blasting booth has an internally vented fabric filter control system and is exempt from permitting per Rule 285(2)(l)(vi)(B).

A parts washer/cleaner that uses detergent is located in the repair bays. The lid on the machine was closed. This process is exempt per Rule 281(2)(h).

PTI 276-92 -

A walk-in coating booth with large doors at the front that allows a truck to be driven in and an overhead door at the back is permitted on PTI 276-92. The booth has dry fabric filters. The coating booth is located in a building bay. The fabric filters are changed regularly depending on use. Hand-held spray applicators are used. The paint is a 2K solvent-based system: 3 parts paint to 1 part hardner. Thinner is used for cleanup. The paint booth has two exhaust stacks and there was no evidence of particulate emissions due to painting operations in the vicinity of the stack vents. The exhaust system is installed, maintained and operating but the air makeup unit was not connected due to the building expansion. The ductwork needed to be reinstalled and currently air make-up was natural draft through an opening into the sidewall of the booth. The exhaust fans pulled the air through the booth. Operators were in the booth spraying in protective clothing and masks. There was some odor outside the booth.

A gun cleaning station/cabinet is located outside of the paint booth. Solvent used in gun clean-up would fall under the permit and contribute to the 2.1 ton per year (tpy) VOC emission limit. The gun cleaning station was open. A 55-gallon drum with a funnel in the top was sitting beside the gun cleaning station. The spent solvent from the gun cleaning station is put in the 55-gallon drum. The permit doesn't have the now standard condition to minimize fugitive emissions and keep all containers closed. The paint station does have a covering/door in order to minimize fugitive emissions when not in use. The gun cleaning station and drum need to be closed when not in use.

Records Review:

Safety Data Sheets (SDS) are maintained electronically and the information on where to find them is posted in the work bays for employee access. Purchase records for paint coating and solvent usage are available. A consultant, GMG EnviroSafe maintains the facility records for safety and environment.

SDS for the paint coatings and thinners, and cleanup solvents showed various volatile organic compounds (VOC), HAPs, and acetone which is not a VOC. Monthly records of coating usage and VOC emission calculations are not being kept in a way that demonstrates compliance with the air permit. The permit doesn't have recordkeeping requirements that include calculation of VOC emissions.

For the paint booth which is operating under PTI 276-92, according to the purchase records from 7/31/2016 to 7/31/2017, the paint and solvent used averaged 50 gallons/month. This is well below the 240 gallons per month limit. VOC emissions for the time period were 1.1 tpy, less than the permit limit of 2.1 tpy of VOC.

Copies of the records are attached to this activity report.

Summary:

The facility appeared to be in compliance with all applicable air quality rules and regulations, and PTI 276-92. Record keeping to demonstrate compliance with the permit will be revised in order to demonstrate monthly usage of paint and solvent, and VOC emissions.

I did discuss with Ray that the paint booth could operate under an exemption from permitting, specifically Rule 287(c). Less than 200 gallons a month of paint coating is used in the booth. The gun cleaning station would need to be operated under a different exemption from permitting such as Rule

290 or Rule 291. Ray would need to request that PTI 276-92 be voided in order to operate under any exemptions. The record keeping requirements for the exemptions would need to be completed.

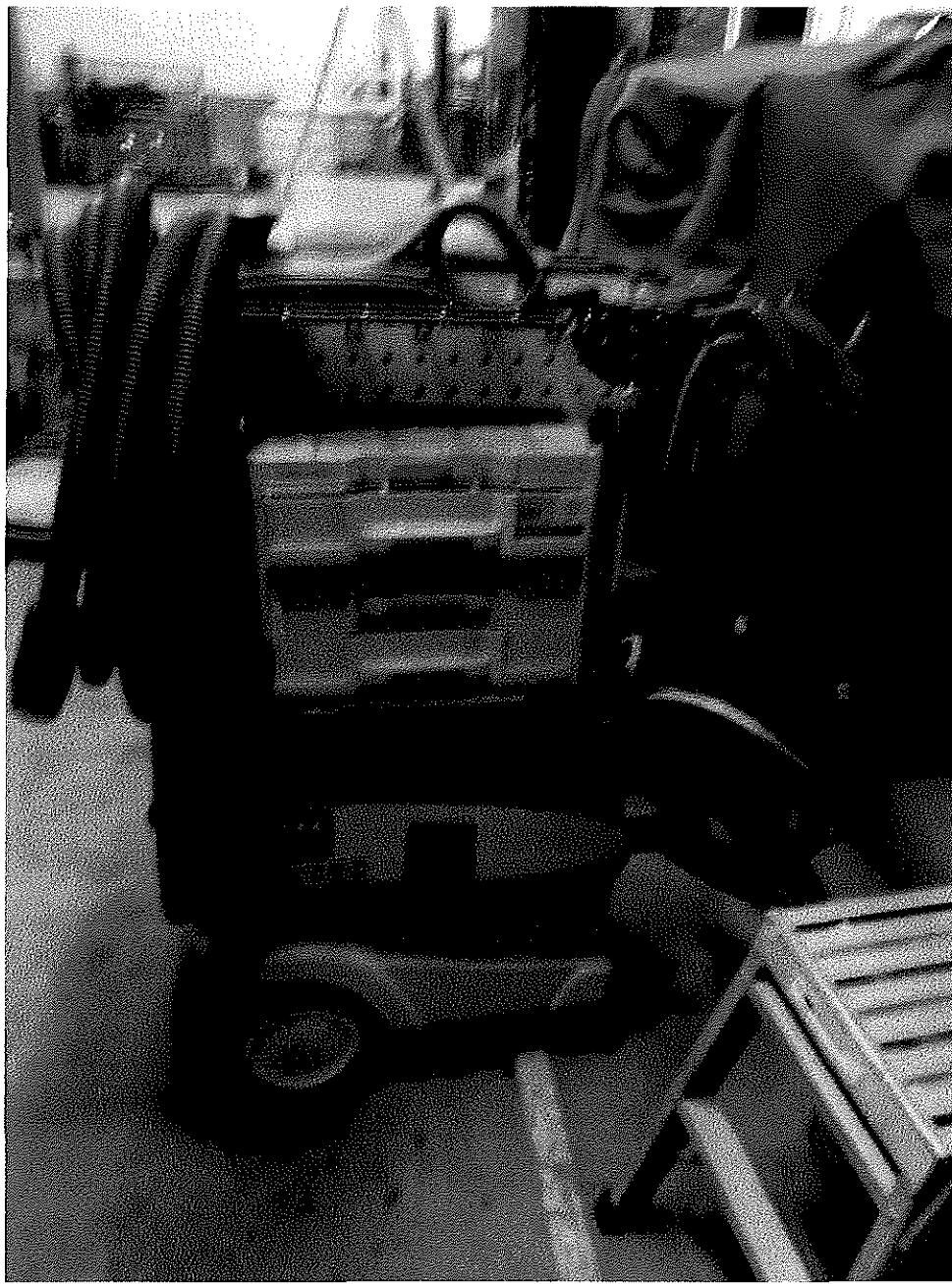


Image 1(1) : Grinding table

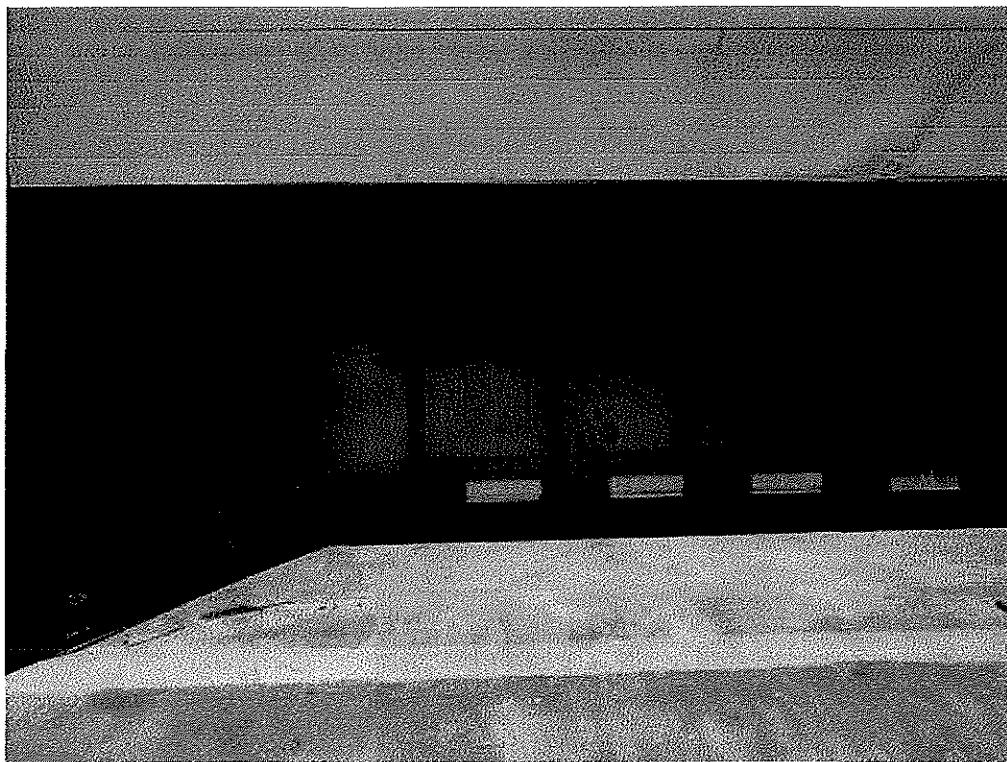


Image 2(2) : Entrance to paint spray booth



Image 3(3) : Exit of spray booth and stacks

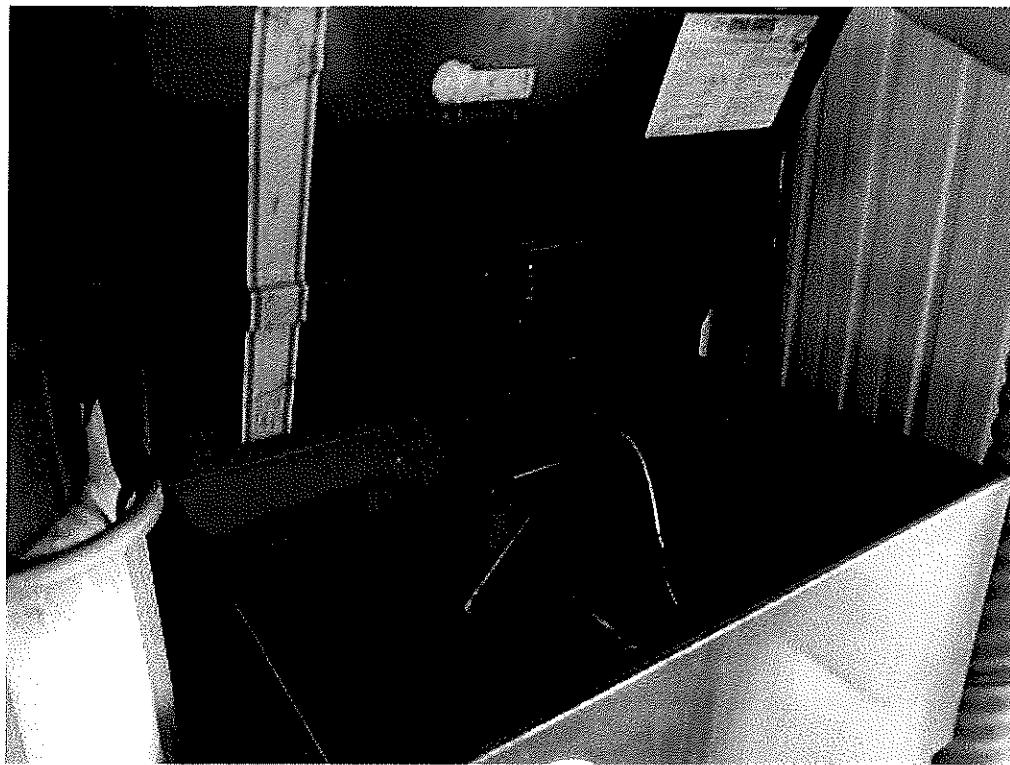


Image 4(4) : Parts washer



Image 5(5) : Spray gun cleaning station

NAME Julie L. BrunnerDATE 9/5/17 SUPERVISOR B.M.