

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

N362846752

FACILITY: Blue Water Chrysler-Plymouth-Dodge		SRN / ID: N3628
LOCATION: 4080 24th Avenue, PORT HURON		DISTRICT: Southeast Michigan
CITY: PORT HURON		COUNTY: SAINT CLAIR
CONTACT: Cheryl Middleton , Office Assistant		ACTIVITY DATE: 10/11/2018
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On Thursday, October 11, 2018, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff, I, Adam Bognar, conducted an unannounced targeted inspection of Blue Water Chrysler-Plymouth-Dodge (the "facility") located at 4080 24th Avenue, Port Huron, MI 48059. The purpose of this inspection was to determine the facility's compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules; and Permit to Install 952-92.

Permit to Install 952-92 is an active permit that was issued in to Blue Water Chrysler-Plymouth-Dodge in 1993 for a dry filter paint booth.

I arrived at the facility at about 1:30 pm. I met with Ms. Cheryl Middleton, Office Assistant. I identified myself, provided credentials, and stated the purpose of the inspection. Ms. Middleton gave me a tour of the facility.

This facility has been an automotive collision shop for at least 25 years. The facility also operates as a car dealership. There is one paint booth in operation. The dry booth exhaust filters were in place. The exhaust filters are located in the booth floor. I observed that they utilize two filters in series so that when the top filter gets dirty the bottom filter remains relatively clean. No painting was being done at the time of my inspection.

VOC emissions are limited by PTI No. 952-92 to 7.5 lbs/hr and 7.5 tons/yr. These emission limits far exceed the actual emissions from the facility based on the usage they report. The facility maintains meticulous records of all paint that is used. Before any spraying occurs, an operator weighs and records the amount of each type paint/coating in the spray mixture. This data is maintained on an onsite electronic database. The operator showed me this database during my inspection.

I reviewed the data and observed that paint usage is generally around 10-20 gallons per month. This corresponds to a max VOC emission rate of approximately 1 ton/yr (assuming a coating VOC content of 7.5 lb/gallon). The hourly rate will likely never be exceeded since painting is not done on a production basis. Safety data sheets for these coatings are retained on site.

I did not observe any visible emissions during my inspection. The exhaust from the paint booth appeared to be discharged unobstructed vertically upwards. This facility appears to comply with all conditions of Permit to Install No. 952-92.

There are two cold cleaners on site that utilize a citrus degreaser type product. The cleaners consist of 2' x 2' sinks on top of a solvent drum. Solvent is pumped out of the solvent drum into a nozzle that is used to wash parts with. There was not any solvent inside the sink area during my inspection. The lids to both cleaners were propped open and usage instructions were not posted. I provided Ms. Middleton with two MDEQ-AQD Cold Cleaner Operating Procedures sheets and instructed her to place them on the cold cleaners so operators can see them. I also instructed Ms. Middleton to keep the lids of the cold cleaners closed at all times when not in use. These cold cleaners appear to be exempt from Rule 201 requirements pursuant to Rule 281 (2)(h).

There is a waste oil burning space heater in the body shop that is used during the winter months to provide comfort heat. The only fuel used in the space heater is oil generated on site that comes from routine oil changes on automobiles. During the summer months, waste oil is sent to a waste facility. The space heater is not very big and appears to have a heat input less than 500,000 Btu/hr. This space heater appears to be exempt from Rule 201 requirements pursuant to Rule 282 (2)(b)(iv). I informed Ms. Middleton that if the facility decides to use waste oil that is generated offsite, then they will need to obtain a Permit to Install from the MDEQ-AQD.

Compliance Determination

This facility appears to be in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution

Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules; and Permit to Install No. 952-92.

NAME Adam Boyer

DATE 10/23/2018

SUPERVISOR SV