

N3691

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

FY 2018 Insp

N369143179

FACILITY: Gerber Collision and Glass		SRN / ID: N3691
LOCATION: 3055 W MAPLE ST, COMMERCE TWP		DISTRICT: Southeast Michigan
CITY: COMMERCE TWP		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 12/14/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	
SUBJECT: FY 2018 inspection of Gerber Collision and Glass ("Gerber")		SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:		

**Gerber Collision and Glass (N3691)**  
**3055 East West Maple Road**  
**Commerce Twp., Michigan 48390-3845**

**Name change: Dwyer & Sons. (N3691) → Adrian's Collision Center (2013) → Gerber Collision and Glass (2014). Gerber has nothing to with the dealership (European car dealer Dwyer and Sons is out of the building; La Fontaine Subaru [Since Nov 2014])**

**Permit-to-Install No. 347-93 dated April 23, 1993 (Blowtherm Booth. Limit: 5.6 tons of VOC per year). Currently, the booth exempt from Rule 336.1201 (<< 200 gallon per month)**

**As US EPA approved an exemption, NOT subject to: NESHAP / MACT 6H, 40 CFR, Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources; Final Rule (Page 1738 Federal Register / Vol. 73, No. 6 / Wednesday, January 9, 2008 / Rules and Regulations / Final Rule). The NESHAP is for area sources engaged in paint stripping, surface coating of motor vehicles and mobile equipment, and miscellaneous surface coating operations. AQD has decided not to take delegation of these standards and therefore no attempt has been made to evaluate Gerber's compliance with NESHAP / MACT 6H. Besides, US EPA approved, via the March 11, 2005, letter (from Ms. Sara J. Breneman, Chief Air Enforcement and Compliance Assurance Branch, US EPA Region V, Chicago to Mr. Tim O'Day, Gerber Collision, Skokie, Illinois) exemption from NESHAP / MACT 6H for spray coatings; other requirements may apply, e.g., methylene chloride paint stripping if performed. Pursuant to 40 CFR, Part 63, § 63.11170(a)(2), Gerber demonstrated that it does not use in its spray coatings the target hazardous air pollutants (target HAP) as defined in 40 CFR, Part 63, § 63.11180. On December 15, 2014, Gerber signed a certification in its petition that none of the coatings it sprays in Michigan contain target HAP. Gerber's all fifteen (15) facilities in Eastern Michigan are affected by this determination.**

**Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations**

On December 14, 2017, I conducted a level 2 self-initiated **FY 2018 inspection** of Gerber Collision and Glass ("Gerber") located at 3055 East West Maple Road, Commerce Twp., Michigan 48390-3845. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules; and PTI No. 347-93.

During CY 2013, Adrian's Collision Centers operated the collision shop for Dwyer. Since November 2014, Gerber Collision and Glass ("Gerber") operates the collision shop independent of the dealership. Gerber bought Collex Collision about 2014 (45 million dollars). Gerber operates 320 collision shops in US and Canada. In addition, Gerber operates ≈40 collision shops in Michigan. Boyd Group operates under trade name Gerber Collision and Glass.

During the inspection, Mr. Joe McLaren (Phone: 248-669-1075; Fax: 248-669-1192; E-mail: Joseph.McLaren@GerberCollision.com), General Manager, assisted me.

Mr. Charles (Chuck) Yager (Phone: 248-669-1075; Fax: 248-669-1192; E-mail: Charles.Yager@GerberCollision.com), General Manager, moved to Livonia facility about August 2016.

Mr. Michael Walker (Phone: 248-295-2079; Fax: 248-295-2094), body shop manager, separated about April 2015. About May 2015, Yager replaced Walker. Mr. Steve Gruber and Mr. Lance Knudsen, former managers, separated from the dealership, Dwyer and Sons.

This is an automotive body-shop. There are three (3) paint spray booths for air-dried paints. One of the three booths is permitted (PTI No. 347-93). While the permitted booth (Blowtherm) paints whole car, unpermitted booths (2) (Global Finishing Solutions) paint parts such as hoods, fenders, doors, etc. Generally prep work such as sanding is done in GFS booths (2). While Blowtherm booth is enclosed on all sides with hard walls, Global Finishing Solutions (GFS) booths (2) are equipped with curtains as enclosures on front side. All three (3) booths are equipped with downdraft filters on the floor. Magnehelic pressure drop ( $\Delta P$ ) gauge is present on the main booth (Blowtherm). During the FY 2018 inspection (12/14/2017), the reading on the Magnehelic was 0.47 inches of water after starting the fan. The painter stated that relatively high pressure drop ( $\Delta P = 0.47$  inch water) was due to snow on the roof. About November 2014, as a new owner, Gerber renovated the booths. The filters are changed when the pressure drop is between 0.35-0.4 inches of water. Gerber performs most painting jobs in Blowtherm booth; mostly prep-work, sanding, priming takes place in Global Finishing Solutions booths (2).

Being a collision shop, paint usage is much less than 200 gallons per month (Rule 336.287(2) (c)). Mr. McLaren stated that 10-20 gallons of paint per month are used among three booths; the usage reduced from 40-50 gallons per month. Business volume has come down.

PTI No. 347-93 limits the permitted booth (Blowtherm) to 5.6 tons of VOC per year. The body shop discontinued keeping VOC records when Mr. Knudsen separated. I asked Mr. McLaren to keep the VOC records using a spreadsheet based upon the paint inventories and purchases. Mr. McLaren stated that Gerber buys paints and solvents exclusively from PPG. PPG has all purchase records on a web-based database. I asked Mr. McLaren to transfer the purchase data, pertaining only to coatings and solvents, from PPG web-based database to MS Spreadsheet and perform the required usage and VOC calculations.

Basecoat coatings are mostly water-based. Clearcoat coatings are always solvent based. Primer coatings are both solvent and water based. Primer surfacer (filler and sealer) is always solvent based.

Gerber emits about 1 ton of VOC per year (PTI No. 347-93, SC15 limit: 5.6 tpy VOC)

The stack is about 30 feet tall with a rain sleeve; the exhaust is discharged vertically upwards.

I asked Mr. McLaren to install the filters properly. I asked Mr. McLaren to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. I also asked him to keep records of paint and solvent usage according to Rule 336.287(2)(c). The records via PPG database and calculations using MS Spreadsheet are acceptable.

### Solvent distillation still

One solvent distillation still of 5-gallon capacity is removed.

### One parts washer

Adrian's took old parts washer.

There is one parts washer. Herkules paint gun washer consists of water-based washer on left half side and solvent cleaner on right half side. Shopline Universal Thinner solvent capacity is 5 gallons. The lid was closed during the inspection. No halogenated solvent is used. Each cold-cleaner is subject to rule 336.1611 (existing) or 336.1707 (new) depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Solvent is supplied by PPG. When solvent is dirty it is shipped to an off-site facility for solvent reclamation.

PPG Industries (800-647-8050) General Purpose Solvent JT501

100% VOC solvent: 30-60% toluene, 10-30 methanol, 7-13% acetone, 5-10% Ligroine. Flash Point (FP) = 22 °F TCC. Auto Ignition = NA °F. Boiling Point (BP) = 100 °F @ 760 mm Hg. Vapor Pressure (VP) = 84 mm Hg at 68 °F (11.2 kPa or kilo Pascals). Specific Gravity (SG, Water = 1.0) = 0.83. Density ( $\rho$ ) @ 68 °F = 6.93 lbs / gallon (NA kg /L). Flammability range = 2.3 %v (LEL) – NA%v (UEL).

I asked Mr. McLaren to talk to PPG to replace this toxic (Toluene & Methanol) and highly flammable (Flash Point [FP] = 22 °F) solvent.

### Conclusion

About 1 ton per year VOC emissions (PTI No. 347-93, SC15 limit: 5.6 tpy VOC). US EPA approved exemption from NESHAP / MACT 6 H for coatings (no target HAP in the PPG coatings).

NAME

D. Heranbalt

DATE

01/29/2018

SUPERVISOR

Joey ZC

