

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

N401330475

FACILITY: Moran Chevrolet		SRN / ID: N4013
LOCATION: 4511 24th Avenue, FORT GRATIOT		DISTRICT: Southeast Michigan
CITY: FORT GRATIOT		COUNTY: SAINT CLAIR
CONTACT: Dave Peacock , body shop manager		ACTIVITY DATE: 07/21/2015
STAFF: Joyce Zhu	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Self-int. inspection		
RESOLVED COMPLAINTS:		

On 7/21, I conducted a self-initiated inspection at Moran Chevrolet, located on 4511 24th Ave., Fort Gratiot. The inspection is initiated due to an active permit (#100-93) for the facility without any current information of the site. I arrived at the location around 3:05 PM. I introduced myself to Mr. Dave Peacock, the body shop manager, & explained the purpose of the inspection. I also provided the permit conditions for the company to make a copy. Mr. Peacock took me to see the paint spray booths.

Permit # 100-93

This permit covers a paint spray booth. During the inspection, there were actually two spray booths; neither of the booths was operating. There was some overspray inside the booths. According to Mr. Peacock, they changed the filters of the booths every 3 – 4 months. Paints were stored in closed containers at the paint mixing room. I didn't see any spills in the storage area; but there were some dry paint spots in the room. Paints are mixed based on the manufacturer suggested ratio. Spray guns are cleaned by purging solvents through. Spent solvents were stored in a closed container which will be picked up by Vesco. Although Mr. Peacock was not aware of the existing permit, he was able to obtain his paint usage as well as VOC emissions from his paint supplier. According to the submitted the paint usage record, the total paint consumption for the two booths is less than 200 gallons during Jan. – the date of the inspection. Clearly, the second booth is exempted from permit requirements per Rule 287 (c). The company's record shows that the total VOC emission was 1.24 tons in 2014 from the two booths. This is much less than the permit limit of 3.8 tons per year for the single booth. The short term VOC emission in terms of pounds per hour has been less than 5 from Jan. – July 19 of this year for two booths (permit limit 7.5 pounds per hour for a single booth). The VOC emission in terms of pounds per day was less than 10 (permit limit 15).

Regulatory Discussion

The permit allows the company to emit VOC up to 3.8 Tons per year. The potential to emit from the exempted booth would be 8.8 tons per year using VOC density of 7.34 pounds per gallon. Because the company has not obtained any enforceable restrictions on HAP emissions, the VOC emission could be treated as HAP emissions. This would put the company into the major source category. During my inspection, I explained the scenario to the company & advised the company to obtain an opt-out permit or a permit limit VOC emissions to become a minor source in order to get out of Title V obligations. Mr. Peacock said he would act on it soon. On 8/5/2015, I talked to Dan from the company. He told me that he has contacted EAC to get help on the permit application. They are going to limit total VOC to below 10 tons so that they don't have to apply Title V permit.

In conclusion, the company appeared to operate in compliance with the permit

requirements. Once the company obtains an opt-out permit, or a permit to limit the VOC emission to become a minor source, they will be able to get out of Title V obligations.

NAME Joyce [Signature]

DATE 8/5/2015

SUPERVISOR CTE