

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

U63180428665328

FACILITY: Caliber Collision		SRN / ID: U631804286
LOCATION: 22031 Woodward Ave, Ferndale		DISTRICT: Warren
CITY: Ferndale		COUNTY: OAKLAND
CONTACT: Kelley Employee ,		ACTIVITY DATE: 11/01/2022
STAFF: Adam Bognar	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, November 1, 2022 Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar conducted an unannounced scheduled inspection of Caliber Collision (the “facility”) located at 22031 Woodward Avenue, Ferndale, Michigan. The purpose of the inspection was to determine the facility’s 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); and Michigan Department of Environmental Quality-Air Quality Division (EGLE-AQD) Administrative Rules.

I arrived at the facility at around 2 pm.

I entered the facility and met with Kelley, Receptionist. I identified myself, explained the purpose of the inspection, and provided identification. I explained that I need to inspect the facility and see records of coating usage. Kelley stated that she would try and get the information I requested while I inspected the facility. Another employee showed me around the shop floor.

Caliber Collision purchased Minser’s Collision in October 2022. According to staff, the previous owner decided to retire and sell the business. Caliber Collision is an automotive body shop specializing in collision repair.

The facility operates two paint booths located adjacent to each other. These are used to paint various automotive body parts using paint spray guns. Both are enclosed downdraft paint booths equipped with both intake and exhaust filters. Kelley stated that floor mounted exhaust filters are changed once per month or more often as needed. The exhaust filters appeared to be properly installed during my inspection. I did not notice any gaps in the filter, and they appeared to be in good shape. Exhaust from both booths is vented outside via rooftop stacks.

These booths are operated without a permit. Permit to install exemption Rule 287(2)(c) limits coatings usage to 200 gallons/month/booth. Paint usage records are not kept; however, paint purchase records are maintained in the front office. The material purchase data is aggregated in a software called “Finishmaster”. I asked Kelley to show me the total paint purchased in September 2022 and April 2022. Kelley was able to provide me this information during my inspection. In October 2022, 69.69 gallons of coatings were purchased. In April 2022, 44.23 gallons of coatings were purchased.

Based on the records I reviewed, the total combined paint usage for both booths is less than 200 gallons per month per booth.

Though the paint booths may meet one of the PTI exemptions in Rules 280 - 291, without enforceable restrictions on emissions from these emission units, Caliber Collision is considered a major source of HAPs according to current AQD supervisor guidance. This guidance is based, in part, on the technical support document for Rule 287(2)(c). The tech support document states the coating use rate of 200 gallons per month would result in VOC emissions less than 10 tons/year and therefore would be considered Best Achievable Control Technology (BACT) for the coating line. The less than 10 tons/year in the tech support document was calculated assuming a worst-case VOC content per gallon of 7.5 lbs minus water as applied. 200 gallons x 7.5 lb/gallon would equal 9 tons/year VOC emissions for one booth. Sources with 2 coating lines would have potential VOC emissions of 18 tons/year. The supervisor guidance assumes that all 18 tons of VOC is a single HAP and does not take into consideration the VOC content of the materials actually used at a facility because there is not a restriction on the VOC or HAP content in the exemption. At 18 tons/year of a single HAP, a source with 2 coating booths using the exemption in Rule 287(2)(c) with no other restrictions would exceed the major source threshold for a single HAP (10 tons/year) and would be subject to Title V and Rule 210 permitting requirements.

Rule 211(a)(i)(A) of the Michigan Air Pollution Control Rules requires sources that directly emit, or have the potential to emit, 10 tons per year or more of an individual hazardous air pollutant (HAP) obtain a Renewable Operating Permit (ROP). Rule 210 prohibits the operation of a source required to have an ROP except in compliance with all applicable terms and conditions of an ROP, unless a timely and administratively complete ROP application has been received. Per Rule 210(4), for a stationary source that is or becomes a major source, as defined by Rule 211(1)(a)(i) to (iii), an administratively complete application shall be considered timely if it is received by the department not more than 12 months after the stationary source commences operation as a major source or otherwise becomes subject to the requirements to obtain a renewable operating permit as a major source.

To avoid Title V and Rule 210 requirements without making process changes, Caliber Collision can either obtain a HAP opt-out permit or a New Source Review (NSR) permit for the coating booths that limits the combined VOC emissions to less than 10 tons/year. Completing a HAP opt-out permit application requires little to no knowledge of air quality regulations. A complete NSR permit application requires a sound understanding and knowledge of air quality rules. However, recordkeeping and reporting requirements that come along with an approved HAP opt-out permit are more onerous than a NSR permit. A HAP out-out permit would require the facility to calculate and keep records of individual and aggregate HAP emissions for all HAP emitting processes and equipment at the facility, report criteria pollutant emissions to the Michigan Air Emissions Reporting System (MAERS) annually, and pay an annual fee of \$250. If the facility gets a NSR permit, they will not have to report to MAERS or pay an annual fee. In addition, calculating emissions to comply with the permit will likely be less complicated.

I discussed this issue with AQD district supervisor Ms. Joyce Zhu. AQD will not issue a Rule 210 violation notice for this non-compliance so long as Caliber Collision obtains a permit to install for the two coating booths in a timely manner. I informed Caliber Collision on November 7, 2022 that AQD will issue a violation notice if AQD does not receive an administratively complete permit to install application by January 6, 2023. I provided Caliber Collision the contact information for

Jenifer Dixon, Air Quality Liaison, Environmental Support Division. I informed Caliber Collision that they could contact Jenifer Dixon for help with the permitting process.

There is a water based cleaner used to wash guns. Based on my observations during my inspection, the water (aqueous) based gun washer is exempt from Rule 201 requirements pursuant to Rule 281 (2)(k).

Fresh coatings were stored in an organized manner. One of the waste coating collection drums had its lid open. I asked a staff member to close the waste coating collection drum and informed Caliber Collision staff that they are required to keep lids closed on waste collection drums.

I left the facility at around 2:30 pm.

Compliance Determination

Caliber Collision operated two spray booths without obtaining a permit from the AQD. These two spray booths have a combined potential to emit an individual hazardous air pollutant (HAP) greater than 10 tons per year. This is a violation of AQD Rule 210. AQD will not issue a violation notice for this non-compliance so long as Caliber Collision submits an administratively complete permit to install application for the two coating booths by January 6, 2023.

Observations made during the inspection and record review indicate that Caliber Collision is operating in compliance with all other 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); and Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules.

NAME Adam Bogner

DATE 11/30/2022

SUPERVISOR K. Kelly