

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

U63190683049482

FACILITY: 8 Mile Collision		SRN / ID: U631906830
LOCATION: 32440 West 8 Mile Road		DISTRICT: Southeast Michigan
CITY: Farmington Hills		COUNTY: OAKLAND
CONTACT: Jayson Kato , Manager		ACTIVITY DATE: 07/02/2019
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-Initiated Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, July 2nd, 2019, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar, conducted an unannounced self-initiated inspection of 8 Mile Collision (the "facility") located at 32440 West 8 Mile Road, Farmington Hills, MI 48336. 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; and Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) rules.

I arrived at the site around 8:30 am. I met with Mr. Jayson Kato, Manager. I identified myself, provided credentials, and stated the purpose of the inspection.

Mr. Kato gave me a tour of the facility. 8 Mile Collision is an automotive collision center. There are two employees that operate the facility Monday through Friday from 8 AM to 6 PM. The facility currently operates without an AQD permit to install.

There is one downdraft paint booth. I observed that the booth is equipped with exhaust filters located in the booth floor. The exhaust filters appeared to be installed snugly with no gaps in the duct intake. Mr. Kato stated that the floor filter is changed as needed. I observed fresh filter material near the booth. Booth exhaust appeared to be discharged unobstructed vertically upwards. I observed an employee painting an automobile body panel during my inspection.

I requested usage records from Mr. Kato to demonstrate compliance with Rule 287(2)(c). Mr. Kato does not explicitly maintain paint usage records; however, he was able to show me invoices for the paint he has purchased in the past month. The invoices I observed show less than five gallons of paint was purchased in June 2019. The paint booth at this facility appears to be exempt from Rule 201 requirements to obtain a permit to install pursuant to Rule 287(2)(c). Rule 287(2)(c) exempts paint booths from AQD permitting if the paint booth is equipped with fabric exhaust filters and the facility demonstrates that paint usage is less than 200 gallons per month. If paint usage exceeds or approaches 200 gallons per month then the facility will need to apply for a permit to install from the Air Quality Division.

Spray guns are cleaned by pouring a small amount of paint thinner into the gun, closing the lid, and shaking the gun. The thinner is disposed of in a 55-gallon drum. The drum was equipped with a funnel, but no lid. I asked Mr. Kato to equip the 55-gallon waste paint drum with a lid. I informed him that I will request to see a picture of the lid on the drum once it is installed.

There are several small buffing/grinding stations in the facility. I did not observe any external exhaust system that served these stations. Buffing/grinding appears to be exhausted to the general in plant environment. Mr. Kato confirmed this and stated that they routinely sweep the floor to get rid of the dust generated. Machining operations at 8 Mile Collision appear to be exempt from Rule 201 requirements to obtain a permit to install pursuant to Rule 285(2)(l)(vi). Rule 285(2)(l)(vi) exempts machining operations from AQD permitting if the machining/buffing/grinding operations are conducted indoors and exhausted to the general in plant environment, or exhausted outdoors through an appropriately designed and operated fabric filter. Machining operations may not be conducted outdoors or exhausted outdoors uncontrolled.

I left the facility at around 9 am.

Compliance Determination

8 Mile Collision 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); and Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules.

NAME Adam Bogner

DATE 7/11/2019

SUPERVISOR SK