

U-63-10-0095

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

Erhard BMW  
FY2017 Insp-

U6310009541235

FACILITY: Erhard BMW of Farmington Hills.		SRN / ID: U63100095
LOCATION: 24600 Crestview Ct., Farmington Hills		DISTRICT: Southeast Michigan
CITY: Farmington Hills		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 11/10/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2017 inspection of Erhard BMW of Farmington Hills. Mostly new car storage facility for Erhard BMW dealership at 38700 Grand River Ave.		
RESOLVED COMPLAINTS:		

U 63 10 0095 - SAR - 2016 11 10  
Erhard BMW  
2016

**A & M Collision (M3794 → P0830), 24792 Hathaway, Farmington Hills. M3794 is an incorrect SRN for this location. Per the July 27, 2017 E-mail (McGeen, Dennis (DEQ) [MCGEEND1@michigan.gov](mailto:MCGEEND1@michigan.gov) Thu 7/27/2017 9:53 AM), SRN M3794 is restored to 24792 Crestview Ct., Farmington Hills. All databases including Permit Cards are corrected. AQD issued PTI No. 801-80 dated November 24, 1980, to A & M Collision (M3794), 24792 Crestview Ct. New SRN P0830 is issued for 24792 Hathaway, Farmington Hills.**

**Hydroblast (M3794 → P0830), 24792 Hathaway, Farmington Hills. Per FY 2017 inspection this is building is used for storage only and A & M Collision moved out. New SRN P0830 is issued for 24792 Hathaway, Farmington Hills.**

**Mail-Tek, Inc. (M3794), 24792 Crestview Ct., Farmington Hills. SRN M3794 is restored to 24792 Crestview Ct., Farmington Hills. All databases including Permit Cards are corrected. AQD issued PTI No. 801-80 dated November 24, 1980, to A & M Collision (M3794), 24792 Crestview Ct. No clean air act activity.**

**Motown Automotive Distributing Co. (U-63-10-0095), 24600 Crestview Ct., Farmington Hills**

**Erhard BMW of Farmington Hills. (U-63-10-0095), 24600 Crestview Ct., Farmington Hills. Mostly new car storage facility for Erhard BMW dealership at 38700 Grand River Ave., about a quarter mile away.**

**Erhard BMW of Farmington Hills. (U-63-17-05228), 38700 Grand River Avenue, Farmington Hills, MI 48335-1521. No Collision Shop; dealership only.**

**AutoMark Collision Center (P0833), 24750 N. Industrial Road, Farmington Hills, serving all Erhard dealerships (3).**

**Lucky's Autoshop, Inc. dba Lucky's Collision (N2025) at 24744 Crestview Ct., Farmington Hills. Lucky's moved and incorrectly carried its SRN N2025 to new location (23980 Industrial Park Dr.). N2025 is restored for this Crestview Ct. location. New SRN P0832 is issued for 23980 Industrial Park Dr. On January 13, 1989, AQD (David M. Fiedler) issued PTI No. 813-88 to Lucky's Collision (Mr. Joseph Struhar, Sr.) at 24744 Crestview Ct. (N2025)**

**Lucky's Autoshop, Inc. dba Lucky's Collision (N2025 → P0832) at 23980 Industrial Park Dr., Farmington Hills. Lucky's moved and incorrectly brought its SRN N2025 to this location from previous location (24744 Crestview Ct.). New SRN P0832 issued for 23980 Industrial Park Dr. All databases are corrected. . N2025 is restored to Crestview Ct. location. . On January 13, 1989, AQD (David M. Fiedler) issued PTI No. 813-88 to Lucky's Collision (Mr. Joseph Struhar, Sr.) at 24744 Crestview Ct. (N2025)**

**Millennium Carpentry (N2028), 24746 Crestview Ct., Farmington Hills**

**Lasher Woodworking (N2028), 24746 Crestview Ct., Farmington Hills. Lasher either moved out or went out of business.**

**SRN reassign: A & M Collision (M3794 → P0830) → Hydrorblast (M3794 → P0830). 24792 Hathaway, Farmington Hills.**

**SRN reassign: Motown Automotive Distributing Co. (U-63-10-0095) → Erhard BMW of Farmington Hills (U-63-10-0095). Google search results in A & M Collision at this address.**

**SRN reassign: Lasher Woodworking (N2028) → Millennium Carpentry (N2028). 24746 Crestview Ct. Lasher either moved out or went out of business.**

**N2025: This SRN is used for two addresses for Lucky's Autoshop, Inc.: 24744 Crestview Ct. and 23980 Industrial Park Dr. (213980 as stated in MACES and Permit-Cards is incorrect). SRN N2025 is associated with PTI No. 813-88, which was voided on November 7, 2013. Lucky's, about 1995, moved from 24744 Crestview Ct. to 23980 Industrial Park Dr. 24744 Crestview Ct. is now a storage space per Mr. Robert Turner of Millennium Carpentry. N2025 is restored to 24744 Crestview Ct. and new SRN P0832 is issued for 23980 Industrial Park Dr. On January 13, 1989, AQD (David M. Fiedler) issued PTI No. 813-88 to Lucky's Collision (Mr. Joseph Struhar, Sr.) at 24744 Crestview Ct. (N2025)**

**M3794: This SRN is used for two addresses for A & M Collision: 24792 Crestview Ct. and 24792 Hathaway, Farmington Hills. Per the July 27, 2017 E-mail (McGeen, Dennis (DEQ) [MCGEEND1@michigan.gov](mailto:MCGEEND1@michigan.gov) Thu 7/27/2017 9:53 AM), SRN M3794 is restored to 24792 Crestview Ct., Farmington Hills. All databases including Permit Cards are corrected. New SRN P0830 is issued for 24792 Hathaway. AQD issued PTI No. 801-80 dated November 24, 1980, to A & M Collision (M3794), 24792 Crestview Ct.**

**N1902: This is SRN for 23890 Industrial Park Drive., Brooks Utility Products and Atoma International USA. Atoma went out of business or moved.**

**N2028: Lasher Woodworking, 24746 Crestview Ct. This SRN is associated with PTI No. 837-88, which was voided on May 03, 2010. Current occupant is Millennium Carpentry (N2028)**

**M3794: PTI No. 801-80 issued to A & M Collision (M3794) was voided on November 7, 2013. M3794 corresponds to 24792 Crestview Ct. (Mail-Tek, Inc.). Hydrorblast (P0830) at 24792 Hathaway is current occupant. Hathaway is misspelled as Hatahway in MACES and Permit-Cards.**

**On November 02, 10, 16, 2016, I conducted a level-2 FY 2017 scheduled inspection of A & M Collision (November 02), located at 24792 Hathaway, Farmington Hills, Michigan 48335-**

1513 and self-initiated inspections of the listed facilities. The inspections were 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; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

### **A & M Collision (M3794 → P0830), 24792 Hathaway, Farmington Hills - FY 2017 Scheduled Inspection**

The collision shop (A & M Collision) is scheduled for FY 2017 inspection. Based upon the FY 2017 investigation, the collision shop does not exist in Farmington Hills. Per Zhu's e-mail to Thelen (October 18, 2013), the collision shop existed at 24792 Crestview Ct. According to SRN and MAPR databases research by Renee Denison (November 04, 2016, 7:35 am, e-mail), A & M Collision (M3794) existed only at 24792 Hathaway, Farmington Hills (this is incorrect). Although google search associates A & M Collision with 24600 Crestview Ct., Farmington Hills, this is unlikely because this an extremely large building for a collision shop. Current occupant of 24792 Hathaway is Hydrorblast (P0830).

In addition, in its Permit Application, which AQD received on September 15, 1980, for Binks Paint Booth, A & M Collision (M3794) wrote 24792 Crestview Ct., Farmington Hills, as both mailing and plant location.

PTI No. 801-80 dated November 24, 1980, issued to A & M Collision (M3794) was voided on November 7, 2013, based upon Zhu's e-mail (October 18, 2013, 2:36 pm). AQD (Geffrey Richardson) issued, on November 25, 1981, PTI No. 801-80 (M3794) to A & M Collision (Patrick Allor) located at 24792 Crestview Ct. Perhaps, Mr. Allor started collision shop business in Walled Lake (Allor Bros Collision, Inc. (N1469)). Allor at Walled Lake went out of business and new collision shop, known as Town and Country Autobody, Inc. (N1469), is operating.

Per the July 27, 2017 E-mail (McGeen, Dennis (DEQ) [MCGEEND1@michigan.gov](mailto:MCGEEND1@michigan.gov) 7/27/2017 9:53 AM), SRN M3794 is restored to 24792 Crestview Ct., Farmington Hills. All databases including Permit Cards are corrected. New SRN P0830 is issued for 24792 Hathaway, Farmington Hills.

### **Hydrorblast (M3794 → P0830), 24792 Hathaway, Farmington Hills**

Based upon November 02, 2016, inspection and a neighbor's information, the building is for storage of needed equipment. This building was formerly occupied by A & M Collision (M3794 → P0830).

Per the July 27, 2017 E-mail (McGeen, Dennis (DEQ) [MCGEEND1@michigan.gov](mailto:MCGEEND1@michigan.gov) 7/27/2017 9:53 AM), SRN M3794 is restored to 24792 Crestview Ct., Farmington Hills. All databases including Permit Cards are corrected. New SRN P0830 is issued for 24792 Hathaway, Farmington Hills.

### **Mail-Tek, Inc. (M3794), 24792 Crestview Ct., Farmington Hills**

Zhu's e-mail (October 18, 2013, 2:36 pm) stated A & M Collision operated at this address under PTI No. 801-80 (M3794) dated November 24, 1980. Per Ms. Renee Denison (November 04, 2016, 7:35 am, e-mail), A & M Collision never operated at this facility; A & M Collision operated at 24792 Hathaway (this is incorrect). AQD (Geffrey Richardson) issued,

on November 25, 1981, PTI No. 801-80 (M3794) to A & M Collision (Patrick Allor) located at 24792 Crestview Ct.

At 24792 Crestview Ct., Mail-Tek, Inc. assembles US Postal Service equipment. No Clean Air Act regulated equipment / process.

**Motown Automotive Distributing Co. (U-63-10-0095), 24600 Crestview Ct.**

Motown Automotive Distributing Co. ("Motown") operated a business of warehousing and distributing of automotive parts for dealerships and repair shops. Motown operated its auto parts supplier business for ≈25 years. AQD (Elmouchi) inspected Motown on March 05, 2010. Currently (FY 2017), Erhard BMW uses this building and parking lot for storage of mostly brand new BMW cars; some used cars are also stored. No Clean Air Act regulated equipment / process. Although google search associates A & M Collision with 24600 Crestview Ct., Farmington Hills, this is unlikely because this an extremely large building for a collision shop.

**Erhard BMW of Farmington Hills. (U-63-17-05228), 38700 Grand River Avenue**

No collision shop. Dealership and mechanical repairs only. As a result, no clean air act regulated process / equipment.

**Erhard BMW of Farmington Hills (U-63-10-0095), 24600 Crestview Ct.**

Erhard BMW of Farmington Hills (Erhard BMW) uses this building and parking lot for storage of mostly brand new BMW; some used cars are also stored. No Clean Air Act regulated equipment / process. Erhard dealerships (3) are operating a paint spray booths and parts-cleaner at one collision shop: AutoMark Collision Center at 24750 N. Industrial, Farmington Hills. Although google search associates A & M Collision with 24600 Crestview Ct., Farmington Hills, this is unlikely because this an extremely large building for a collision shop.

**Lucky's Autoshop, Inc. dba Lucky's Collision (N2015) at 24744 Crestview Ct.**

Lucky's Autoshop, Inc. ("Lucky's"), according to Mr. Joey Struhar, moved out about 1995 and started doing business at 23980 Industrial Park Dr. According to Zhu's e-mail (October 18, 2013, 2:36 pm), AQD voided PTI No. 813-88 (N2015) on November 07, 2013. AQD (Zhu) inspected Lucky's, at 24744 Crestview Ct., on October 10, 2013, and found it to be a storage space for medical equipment. Also, on November 10, 2016, Mr. Robert Turner of Millennium Carpentry stated that this building had been used for storage only; nobody was available at the address. Mr. Turner also stated that the business operators / employees usually came in the morning to obtain some tools and materials.

However, both in MACES and permits-cards, this permit (N2015 & PTI No. 813-88) is associated with 23980 Industrial Park Dr., Farmington Hills.

In addition, on January 13, 1989, AQD (David M. Fiedler) issued PTI No. 813-88 to Lucky's Collision (Mr. Joseph Struhar, Sr.) at 24744 Crestview Ct. According to his son Mr. Joey Struhar, Lucky's moved, about 1995, to 23980 Industrial Park Drive. Lucky's took its SRN (N2015) to new location.

Per the July 27, 2017 E-mail (McGeen, Dennis (DEQ) [MCGEEND1@michigan.gov](mailto:MCGEEND1@michigan.gov) 7/27/2017 9:53 AM), SRN N2025 is restored to 24744 Crestview Ct., Farmington Hills. All databases

including Permit Cards are corrected. New SRN P0832 is issued for 23980 Industrial Park Drive., Farmington Hills.

### **Lucky's Autoshop, Inc. dba Lucky's Collision (N2015 → P0832) at 23980 Industrial Park Dr.**

Per the July 27, 2017 E-mail (McGeen, Dennis (DEQ) [MCGEEND1@michigan.gov](mailto:MCGEEND1@michigan.gov) 7/27/2017 9:53 AM), SRN N2025 is restored to 24744 Crestview Ct., Farmington Hills. All databases including Permit Cards are corrected. New SRN P0832 is issued for 23980 Industrial Park Drive., Farmington Hills.

During the FY 2017 inspection, Mr. Joe Struhar (Phone: 248-471-1448; Fax: 248-471-6495; E-mail: [LuckysCollision@Gmail.com](mailto:LuckysCollision@Gmail.com)), assisted me. His father Mr. Joseph Struhar, Sr., Owner and President, was not present.

Lucky's Autoshop operates a collision shop at this location since 1995. According to Mr. Joey Struhar, Lucky's moved, about 1995, to 23980 Industrial Park Dr. from 24744 Crestview Ct. Before that (until 1984) Lucky's operated a collision shop business in Detroit (near 8 Mile Road). Both in MACES and permits-cards, this permit (N2015 & PTI No. 813-88) is associated with 23980 (both MACES & PermitCards: 213980, which is incorrect). Industrial Park Dr., Farmington Hills. On January 13, 1989, AQD (David M. Fiedler) issued PTI No. 813-88 (N2015) to Lucky's Collision (Mr. Joseph Struhar, Sr.) at 24744 Crestview Ct. According to Zhu's e-mail (October 18, 2013, 2:36 pm), AQD voided PTI No. 813-88 on November 07, 2013.

#### Rule 287(2)(c) Diamond Booth

Luckys performs its collision painting in one Diamond Booth (25 ft. D \* 12 ft. W \* 12 ft. H). The booth is equipped with a downdraft filter system for paint overspray particulate control. The booth is also equipped with a filter system for intake air for finish quality. The downdraft filters were installed and operating properly during the inspection. The filters are replaced about once per month. I stated that the filters may be replaced based upon pressure differential ( $\Delta P$ ) across the filters. The booth is equipped with Dwyer inclined manometer for pressure differential ( $\Delta P$ ) across filters. However, there was no dyed water in the manometer. Also, the manometer was not connected. I asked Joey Struhar to repair the manometer such that  $\Delta P$  can be reliably used for filter system performance measurement.

#### Cold-cleaner (1)

One Hercules (3 ft. x4 ft.) parts cold-cleaners with spray a brush and a solvent tank is present. The cold-cleaners are subject rule 336.611 or 336.1707 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 (Rule 611) cold cleaners were placed into operation prior to July 1, 1979. New (Rule 707) cold cleaners are placed into operation on or after July 1, 1979.

One Hercules unit may be described as a "sink on a drum". The solvent is stored in the drum (enclosure reservoir) of about 30 gallons capacity. Parts (especially painting guns) are placed in the sink area and solvent is pumped over the part. The solvent then drains back into the drum due to gravity. Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner.

Mineral spirits containing no halogenated solvent is used. Once a month, dirty solvent is picked up for disposal or recovery. Mechanically assisted lid was closed during the inspection. The work-practice procedures were not posted.

The Cold-cleaners is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used. Although toluene is CAA Sec. 112 HAP, it is not a halogenated compound.

During the FY 2017 inspection, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice in the procedures.

Lacquer Thinner PSE 50 (Grow Automotive, 760 Pittsburgh Dr., Delaware, Ohio 43015). The solvent consists of 30-60% toluene (CAS # 108-88-3), 10-30% methanol (CAS # 67-56-1), 7-13% acetone (CAS # 67-64-1), and 5-10% ligroin (CAS # 8032-32-4).

100% VOC solvent. Flash Point (FP) = 22 °F TCC (Tag Open Cup). Auto Ignition = NA °F. Boiling Point (BP) = 100 °F @ 760 mm Hg. Vapor Pressure (VP) = 83 mm Hg at 68 °F (11.1 kPa). Specific Gravity (SG, Water = 1.0) = 0.80. Density ( $\rho$ ) @ 68 °F = 6.93 lbs. / gallon (0.790 kg /L). Flammability range = 2.6 %v (LEL) – 11.1%v (UEL).

#### **Lasher Woodworking (N2028), 24746 Crestview Ct., Farmington Hills**

Lasher Woodworking does not exist anymore at this site. About 2005, Millennium Carpentry moved into this building from Southfield (8 Mile & Telegraph). Mr. Robert Turner of Millennium Carpentry does not know anything about Lasher.

AQD voided, on May 03, 2010, PTI No. 837-88 (N2028) based upon the February 16, 2010, inspection (AQD's Elmouchi). According to the permit, Lahser was a custom furniture manufacturing facility with a spray booth, which was used to apply wood stains and wood sealers.

#### **Millennium Carpentry (N2028), 24746 Crestview Ct., Farmington Hills**

Lasher Woodworking does not exist anymore at this site. About 2005, Millennium Carpentry, moved into this building from Southfield (8 Mile & Telegraph); Millennium is in business for ≈30 years (as of Nov 2016).

During the November 10, 2016, inspection Mr. Robert Turner (Phone: 248-996-7741; Fax: 248-644-9915; E-mail: [rTurner@MillenniumCarpentry.com](mailto:rTurner@MillenniumCarpentry.com)), Plant Manager, assisted me. Mr. Andrew Sallan (Phone: 248-645-9005; Fax: 248-644-9915; E-mail: [aSallan@MillenniumCarpentry.com](mailto:aSallan@MillenniumCarpentry.com)), Owner, was also present. In addition, Mr. Robert Silkowski, painter, helped as well with questions about the booth.

#### **Rule 287(2)(c) Paint Spray Booth (Col-Met)**

One solvent-based paint spray booth (Col-Met Spray Booth: 15 ft. W x 20 ft. D \* 12 ft. H) with a back-draft dry filter system is present. Intake air filter system is also present for finish quality. The booth is enclosed and heated for quick drying. All coatings are solvent-based (basecoat [BC], clear coat [CC], varnishes, mostly conversion varnishes). Coating usage records are not kept. Mr. Silkowski, a painter, stated that about 50 gallons of paint per month were used based upon his estimate. The booth is equipped with Magneheilig gauge for pressure differential ( $\Delta P$ ;  $\Delta P$  reading = 0.10 inches of water on November 10, 2017).

I asked Mr. Turner 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 booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(c).

Upon keeping usage records (an estimate based upon purchase records is available), the coating booth meets all of the Rule 336.1287(2)(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

#### Rule 287(2)(c) Paint Spray Booth (VentLess)

One solvent-based paint spray booth (VentLess Spray Booth: 6 ft. W x 6 ft. D \* 6 ft. H) with a back-draft dry filter system is present. Unlike Col-Met Spray Booth, this VentLess booth is neither enclosed (open at front) nor heated. The filter system consists of two filter layers: first layer is for paint overspray particles and second layer is impregnated with activated carbon for VOC control. The booth is open at front (not enclosed). Carbon filter is replaced once per year. All coatings are solvent-based. Coating usage records are not kept. The painter stated that about 20 gallons of paint / coatings per month were used based upon his estimate.

I asked Mr. Turner 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 booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(c).

#### Misc. particulate sources

One common manifold for saw dust transport is present. Saw dust from variety of machines (cutting, drilling and sanding, etc.) is pneumatically transported to one common dust collector consisting four giant bags. Each bag has dimensions: 6 feet tall and 2 feet diameter. Four 55-gallon drums are present as hoppers; one drum for each bag. The bags service the following equipment / processes:

1. SCMI edge bander (Olimpic K360)
2. SCMI wide belt surface sander (SCMI Sandya 300)
3. CNC nest router (SCMI group)

In addition, the following equipment, each with a dedicated bag, are present:

1. Hinge machine with a bag (3 ft. H \* 2 ft. diameter)

2. Steel City Planner and Delta Joiner (DJ20) with a bag (Delta Dust Collector: 3 ft. H \* 2 ft. diameter)
3. Delta saw with bag (General: 3 ft. H \* 2 ft. diameter)
4. Altendorf F45 Table Saw (Sider) with a bag (Delta Dust Collector: 3 ft. H \* 2 ft. diameter)

All machines release exhaust air, upon cleaning using corresponding bag (s), to in-plant environment. The saw dust generating machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(l).

### **AutoMark Collision Center (P0833), 24750 N. Industrial Road**

During the FY 2017 inspection, Mr. Andrew Lekosiotis (Phone: 248-473-8100; Fax: 248-473-0800; E-mail: [aLekos@WorldOfErhard.com](mailto:aLekos@WorldOfErhard.com)), assisted me.

AutoMark Collision Center serves all Erhard dealerships (3).

### Rule 287(2)(c) Paint Spray Booths (4)

In all, AutoMark has four (4) Global Finishing Solutions booths: two soft (non-metallic walls) booths (aka prep-deck), where sanding and primer application takes place and two hard (metallic walls) booths, where topcoat (basecoat [BC] & clearcoat [CC]) application takes place. Within soft / prep-deck booths, topcoat application never takes place as they cannot be heated. Each prep-deck (2) is equipped with a down-draft filter system and intake air filter system. Also, each hard booth (2) is equipped with a down-draft filter system (for paint overspray particles) and intake air filter system (for finish quality). Unlike prep-deck, each hard booth is equipped with one manometer for pressure differential ( $\Delta P$ ) across filters. Unlike prep-deck, each hard booth (topcoat) can be heated ( $\approx 100$  °F) to speed up drying.

All paints are purchased from Axalta (Du Pont). Paint usage records are kept. While all primers and basecoats (BC) are water based, all clearcoats (CC), as always, are solvent-based. About 10 gallons per month clearcoat coatings are used.

I asked Mr. Lekosiotis to install and inspect the filters such that they fit, at all times, snugly without gaps and holes.

Each (4) booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(c).

Each coating booth meets all of the Rule 336.1287(2)(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

According to Mr. Lekosiotis, all painters are trained per NESHAP / MACT 6H.

Becca Power Cleaner Solvent Recovery Unit

Waste paints and solvents are heated in the Becca machine to evaporate solvents. Thus evaporated solvents are condensed and collected in 5-gallon tank (<< 55 gallons per 285(2) (u)). This is a solvent recovery unit. Practically dry sludge is disposed of.

The Becca unit is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2) (u).

BECCA Aqueous Cleaner

This is a water based cleaning unit for tools, guns, etc..

**Conclusion**

SRN discrepancies are resolved.

NAME

R. R. Hannahall

DATE

08/28/2017

SUPERVISOR

Joey B

