

B3338  
Mawila

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B33383430

FACILITY: PAT MILLIKEN FORD INC		SRN / ID: B3338
LOCATION: 9600 TELEGRAPH ROAD, REDFORD TWP		DISTRICT: Detroit
CITY: REDFORD TWP		COUNTY: WAYNE
CONTACT: Peter Battle , General Manager		ACTIVITY DATE: 01/19/2016
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Spray Booths		
RESOLVED COMPLAINTS:		

INSPECTED BY : Terseer Hemben, MDEQ  
PERSONNEL PRESENT : Peter Battle (General Manager)

FACILITY PHONE NUMBER : (313)-255-3100, X260  
FACILITY FAX : (313) -255-1027  
DATES OF INSPECTION : 1/19/2016  
SRN: B3338, Minor  
Pat Milliken Ford, Inc.  
9600 Telegraph Road, Redford, MI 48239

**FACILITY BACKGROUND:**

The Pat Milliken Ford Inc. (PMF) is a dealer in Ford vehicles. PMF operates dealership businesses at several locations including, Livonia, Redford, Dearborn and Westland. The company sells new vehicles, used vehicles and performs onsite collision repairs at its Redford location. The collision repairs involve sanding and spray painting in two spray paint booths at the site. The painting process involves installation and operation of spray paint booths.

The installation and operation of spray paint booths requires an approved permit to install from the Michigan Department of Environmental Quality (MDEQ)-Air Quality Division (AQD) or from delegated local air agency, prior to installation. The AQD file shows PMF was issued installation permit # C-1247 by the Wayne County Air Pollution Control Division for the installation of a Devibis paint spray booth. The second spray booth does not appear to have been issued an air permit.

In January 8, 2008, the environmental Protection Agency (EPA) issued the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources; the regulation is known as MACT 6H. On April 30, 2012, PMF petitioned EPA Region 5 requesting an exemption from MACT 6H under paragraph 40 CFR 63.11170(a)(2), which requires a demonstration that spray coating process applies no coatings that contain the target HAP as defined in 40 CFR 63.11180. on March 4, 2013, EPA Region 5 agreed, based on the information submitted by PMF, that the facility was exempt from MACT 6H.

It is noted here that the AQD has not accepted the delegation to enforce MACT 6H from EPA Region 5, therefore, compliance with this regulation will not be addressed within this report.

**INSPECTION NARRATIVE**

I arrived at the Pat Milliken facility on January, 19, 2016. The purpose of my visit was to conduct a scheduled annual compliance inspection. The average temperature for the day was 16 F with wind speed 2 mph coming from the WNW. I was admitted onto the property by Mr. Carl Waller II, the Collision Center Manager. Mr. Waller II introduced me to the General Manager, Mr. Peter Battle. Mr. Battle and I went through pre-inspection conference items before taking a tour of the facility located at 9630 Telegraph Road to inspect the spray booth and associated stacks. We walked through the spray paint booth area. I observed the facility was equipped with assorted standard spray guns, quarts, pints and gallons of spray paint. The equipment was located in the paint mixing room. The spray paint booths were equipped with powerful fans for pulling air drafts through the roof/ceiling and floor. The gases from spray paint booths were directed unobstructed vertically upward through the filters and out into ambient air through the stacks. A post-inspection interview confirmed the facility's paint usage averaged 1 gallon of

paint/primer per week, and 4 gallons of paint/primer per month. The spray paint gun washing basin was piped into a 55 gallon drum for containment and sealed for a waste management contractor for disposal. Records of paint used and waste minimization plan at the site were made available at the inspector's request. This data complied conditions exemption under the Exempt Rule 287 (c) and Rule 370. The WC permit# -1247 was not issued with enforceable conditions.

I observed the Devilbis system of vapor tight spray booths with down draft filters and ~ 9200 cubic ft per min fans were working properly under low positive pressure as read from the flow meter gages. The system was equipped with automatic booth pressure balance controller. The pressure equalization controller maintained a balanced air flow patterns in the sealed tight booths. There were no paint odors perceived outside the workshop while the system was in operation.

**COMPLAINT/COMPLIANCE HISTORY:**

The facility did not have a history of odor complaints.

**OUTSTANDING CONSENT ORDERS:**

None

**OUTSTANDING LOV'S:**

None

**OPERATING SCHEDULE/PRODUCTION RATE:**

The PMF operated the coating process 8 hours per day, and 6 days a week depending on load demands.

**EQUIPMENT AND PROCESS CONTROL:**

None

**COMPLIANCE STATUS:**

PMF operates metal sanding process and two spray booths. One of the spray booths was issued WC permit C-1247 in 1970. However, PMF reports that the facility switched from solvent based paint to water based paint in 2011. The change required the acquisition of new paint guns, and essential supplies. Such an alteration typically qualifies as a modification under AQD Rule 201(1) and requires a new or modified permit to install. However, it is accepted that all operations at PMF qualifies for exemptions from Rule 201(1), including the modification.

Rules 278 and 278a - In compliance- Processes that qualify as a major New Source review project, and emit a significant amount of criteria pollutants, are subject to major source MACT standard under 40 VFR Part 63, or are subject to a NESHAP under 40 CFR Part 61 are not eligible for exemptions within Rules 279 through 290.

PMF is a repair shop. The facility is not a production venture. The operational design of the facility limits the potential to emit criteria pollutants and hazardous air pollutants to less than major source levels.

Rule 285(I)(vi)- In compliance- exempts equipment used for the sanding of metals provided that the equipment: (A) is used on a nonproduction basis; or, (B) releases emissions only I the general in-plant environment, or, (C) if emissions are externally vented, the emissions are controlled by an appropriately designed and operated fabric filter that, for a specified operations with metal, is preceded by a mechanical precleaner.

Based on Rule 285(I)(vi) conditions the sanding operations at PMF qualify for the exemption because the sanding process is carried in an enclosed area, and particulate emissions are occur in the in-plant environment.

Rule 287(c)-in compliance-Exempts a surface coating line for which: (I) the coating use rate is not more than 200 gallons, as applied, minus water, per month; and, (ii) is supplied with

a properly installed and operating control system; and, (iii) for which coating use records are maintained for the most recent 2 year period.

Visual observations during the inspection, statements from PMF, and records obtained from PMF show that both spray booths qualify for the exemption for the following reasons:

i and iii-The manager of PMF stated the paint process used an average 4 gallons of paint per month. Records covering the last 24 months indicated low purchase quantity per month owing to low demand for use.

ii. The coating system operated the particulate control system that was properly installed and worked properly.

PMF demonstrated the spray booth stations, and mobile enclosures were fitted with a type of filter technology that poised particulate material control achievement of at least 98-percent capture of paint overspray, and the procedure was consistent with American Society of Heating, Refrigerating, and Air-conditioning Engineers (ASHRAE) Method 52.1, Gravimetric and Dust-Spot procedures for Testing Air-Cleaning Devices were used in general ventilation for removing particulate matter, June 4, 1992 as a reference authority. In spray booths and paint mixing station area, I observed the system was sealed in satisfactory and proper manner that facilitated automatic pressure balance in the spray system. Page 77 reflects the metrics of filter efficiency in pressure drop versus paint collected. The checklist item indicated compliance with Rule 278(c).

PMF demonstrated all paint spray guns cleaning were performed such that an atomized mist or spray of gun cleaning solvent and paint residue was not cleaned outside of a container that collected used gun solvent. Inspector observed there was a designated wash basin inside the paint mixing room where spray guns were manually cleaned/washed and associated vapors vented through the filter into the stack. The spent wash was collected in a 55 gallon drum, sealed and posted out for the waste management contractor to dispose. Literature highlighting the mechanics of spray guns used at the facility is attached [pg. 82-85]. The response indicated the facility was in compliance with Rule 370(1).

#### APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

This facility did not have nor was in need of fugitive dust plan.

#### MAERS REPORT REVIEW:

This facility was a minor source that did not need to report to MAERS.

#### FINAL COMPLIANCE DETERMINATION

The inspection of PMF determined the facility operated in compliance with state and federal air regulations. Wayne County Installation Permit C-1247 is no longer applicable and will be voided.

NAME flr

DATE 8/18/16

SUPERVISOR JK