

B4572
MANILA

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

B457245588

FACILITY: GORDEN CHEVROLET		SRN / ID: B4572
LOCATION: 31850 FORD ROAD, GARDEN CITY		DISTRICT: Detroit
CITY: GARDEN CITY		COUNTY: WAYNE
CONTACT: John Butkovich , Fixed Operations Director		ACTIVITY DATE: 07/18/2018
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Coating		
RESOLVED COMPLAINTS:		

Gordon Chevrolet, Inc.

INSPECTOR: Terseer Hemben (DEQ)
PRESENT: John Butkovich (Fixed Operations Director)
Date of Inspection: August 13, 2018
SRN: B4572

Address: 31850 Ford Road, Garden City, MI 48135

Regulatory Rules:

Federal-40 CFR 63, Subparts HHHHHH

State: R 336.1201; R 336.1287(c), R 336.1910; R 336.1901.

FACILITY BACKGROUND: A Spray Painting Process.

The Gordon Chevrolet Inc. (GCI) operates an auto dealership with an onsite spray paint booth system at the 31850 Ford Road, Garden City, Michigan. The spray paint process involves sanding, priming and coating of metal surface with a water-based coating. This process decorates the finish and body-looks of the automobile. GCI installed and operated two booths at the site. The business operates five days in a week for 10-11 hours per day. Historically, the facility was permitted by the Wayne County Department of Environment and Health to install and operate the 2 booths and an oven. The installation included a downdraft system with stacks serving the 2 booths. Completion and commissioning of the system was made in 1993. Since that time the facility chose to void the permits and operate each booth under the Rule 287(c) exemption. Paint purchase and records of paint usage were necessary for evaluation of compliance status with Exempt Rule 287(c).

COMPLAINT/COMPLIANCE HISTORY:

The GCI had a complaint attributed to the operations of booths and ovens last year. However, an on-site investigation concluded that there was not an observed violation.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING VNs:

None

SCHEDULE/PRODUCTION RATE:

The facility operates a one 10-11 hour shift from Monday to Friday depending on production load.

PROCESS DESCRIPTION:

The GCI facility was originally permitted by the Wayne County Department of Air Pollution Control and Health, but now operates 2 spray paint booths and gas fired ovens as allowed by the Rule 287(c) exemption. The process consists of sanding, priming, painting and curing auto parts. Controls for the process were built into the equipment and process. The spray paint booths have dry filters with cross draft and downdraft pressure that pulls gases into the fabric filters. The filters have removal efficiency 99.8%. The guns have delivery efficiency above 75% [Attachment Pgs. 16-18]. The coatings are water based with minimal VOC content. The facility does not use chemicals to strip paint, hence no methylene chloride is used in the process. Parts surface are washed with aqua-based detergents. Gaseous exchange with the ambient takes place through the twin stacks ducked to the booths. Spent filters are regularly removed and disposed through waste management contractors [Attachment, Pgs. 3-15].

APPLICABLE RULES/ NESHAP CONDITIONS:

The operations of GCI facility were evaluated as: -

Rule 201 (1) – GCI operated under the Rule 287(c) exemption for each of the 2 spray booths and verbally stated there had been no change or modification of equipment or process at the facility in the past 5 years. The facility operated in compliance with this rule.

GCI submitted all paints purchased and used. The information on records was maintained for at least 5 years for examination by the DEQ Supervisor [Attachment Pg. 37].

GCI stated the company had a set quantity of paint in credit line with the paint supplier. The paint supplier delivers the set number of gallons of paint per month to replace the quantity used. The quantity of paint delivered does not exceed 200 gallons per month [Attachment Pgs. 37-38].

GCI maintained the Tekna Gravity spray paint booth gun, DEVILBISS certified filters and associated equipment in a satisfactory manner. Visual inspection indicated the guns used for spraying the paint were washed and stored in a trough located in the booth area, and spent filters were changed and disposed offsite through contractor arrangements [Pgs. 16-33].

GCI managed all wastes generated from painting processes and disposed in a satisfactory manner through a contractor. Wastes packed in a 55-gallon drum is picked up by the contractor along with the spent filters for disposal off the site [Attachment Pgs. 3-15].

GCI presented a letter from USEPA Region 5 stating that the operations at the facility were exempt from the Subpart HHHHHH regulation provided that the information provided to EPA is and remains accurate [Attachment Pg. 1].

GCI presented the technical information qualifying the DEVILBISS spray guns used in spray coating had an efficiency of 98% or equivalence of HVLP or equivalent technology [Attachment Pg. 16].

GCI operated the spray booth that was properly installed with quality filters and operated in a satisfactory manner. Information regarding the equipment was obtained in a previous inspection and is in AQD files [Pgs. 16-18].

GCI managed wastes from coatings properly to minimize reintroduction of contaminants into the environment. Visual inspection observed wastes from coatings were contained in 55-gallon drums. Spent filters were put in plastic bags and put in dumpsters for disposal through

contractor arrangement.

GCI maintained and kept the MSDS information for paints used for coating. The document was kept and maintained on site for examination by the DEQ. The MSDS collected during the previous inspection is on file. No additional chemical products requiring maintenance of MSDS was added to the paint inventory [Pg. 39].

GCI discharged the exhaust gases from coatings vertically unobstructed through the stacks to the ambient air. Visual inspection confirmed the compliance operation of the stacks.

REGULATORY DISCUSSIONS

The facility provided a letter dated May 4, 2012 from the USEPA Region 5 stating that the operations at the facility are exempt from Subpart HHHHHH so long as the activities remain the same.

Rule 910: GCI used and maintained filters in a satisfactory manner.

Rule 301: There was no opacity of emissions coming out of the stacks during the inspection.

Rules 901: There were no odors noted during the inspection.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

This facility did not have nor needed a fugitive dust plan.

FINAL COMPLIANCE DETERMINATION:

The inspection of Gordon Chevrolet Inc. facility and review of record keeping determined the GCI operated the spray paint booth in compliance with the paint chemical stripping free process. The facility complied with the Rule 287(c). The facility operated tight sealed spray booths with automatic pressure balance system for emission controls.

NAME

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DATE

10/22/2018

SUPERVISOR

JK