

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

B857964790

FACILITY: MICHIGAN FLEET REPAIR CO		SRN / ID: B8579
LOCATION: 6512 N DORT HWY, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Dave Herrick , General Manager		ACTIVITY DATE: 09/26/2022
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection of coating facility which appears to have never been inspected by AQD, since facility startup in 1981.		
RESOLVED COMPLAINTS:		

On 9/26/2022, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Michigan Fleet Repair, a business which received a permit to install (PTI) and permit to operate (PTO) for a coating booth in 1981 and 1983, respectively, but had never been inspected by AQD until now.

The above inspection was part of AQD's yearly commitment of inspections to the United States Environmental Protection Agency. Because of environmental justice concerns in the vicinity of North Dort Highway and East Carpenter Road, this facility was selected for an inspection. Additionally, AQD regularly tries each year to inspect facilities which have not been inspected for a number of years, or which may have never been inspected before.

Facility environmental contact:

Dave Herrick, General Manager; 810-787-2124; 810-787-2124; mifleet6512@att.net

AQD contact:

Dan McGeen (myself), inspector; 517-648-7547; mcgeend@michigan.gov

Facility description:

Michigan Fleet Repair fixes damage to larger vehicles such as school buses, and does touch up painting, though does not typically repaint an entire bus.

Emission units*:

Paint spray booth with mat/panel filters; under PTO No. 136-81

*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.

Regulatory overview:

Permit to Install No. 136-81 was issued on 3/13/1981 for a paint spray booth. As was customary for AQD in 1981, a Permit to Operate, No. 136-81, was subsequently issued, on 10/7/1983. (This dual permit system for minor sources of air emissions is no longer used by AQD, and only a PTI is issued.)

Michigan Fleet Repair is considered to be a true minor source. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide,

nitrogen oxides, sulfur dioxide, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

Michigan Fleet Repair is also considered a minor or *area source* for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

A paint spray booth such as the one utilized by Michigan Fleet Repair may qualify for exemption from the requirement of Michigan Air Pollution Control (MAPC) Rule 201 to obtain a PTI, by meeting the criteria of the MAPC Rule 287(2)(c) exemption for coating booths. This exemption applies to:

(c) A surface coating line if all of the following conditions are met:

(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.

(ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

Fee status:

This facility is not considered fee-subject, as it is not known to be a major source for criteria air pollutants, or for HAPs, nor is it subject to a federal New Source Performance Standard or a Maximum Achievable Control Technology standard.

This facility is not required to report annual emissions through the Michigan Air Emission Reporting System (MAERS). Criteria for those facilities which must report to MAERS on an annual basis are identified in *AQD-013: Criteria Pollutant Threshold Levels for the Point Source Emissions Inventory*

Location:

The facility is located in a known Environmental Justice area. It is located on the east side of N. Dort Highway, opposite from a business, Environmental RUBber Recycling. It is located immediately south of a motel, and about 125 feet south of a trailer park, as measured by me in Google Maps. To the east, the closest residences are about 800 feet away, beyond an industrial property. To the south is the Bay Area Logistics yard. . .

Past inspections:

None.

Past violations:

None.

Past complaints:

None.

Safety equipment needed:

I am not aware of the safety requirements for this site. As a general practice, i wore steel-toed boots, and safety glasses with side shields for the inspection. I wore a disposable paper mask out of personal preference, during the ongoing COVID pandemic.

Arrival:

No odors or visible emissions could be detected from the facility. Weather conditions were lightly raining and 54 degrees F, with winds out of the west at 5-10 miles per hour. .

I followed the posted sign on the front door which advised using the side entrance, Once inside, I met with Mr. Dave Herrick, General Manager, and his wife, Mrs. Reisa Herrick, who runs the office. I provided my credentials, and explained that I would like to conduct an inspection.

Mr. Herrick explained that he has worked here since 1983, and they had never been inspected before by AQD. He was curious as to what prompted the inspection. I explained that based upon the high level of public interest in the surrounding EJ community, AQD was focusing on a number of industries in the vicinity of N. Dort Highway and E. Carpenter Road for inspections, during the 2022 fiscal year.

Inspection:

I was informed that their throughput of coatings is about 50 gallons per month, far less than the MAPC Rule 287(2)(c)(i) exemption's upper threshold of 200 gallons per month. They were able to demonstrate this by using receipts for paint purchases from their recordkeeping, discussed later in this report.

The housekeeping in the facility appeared to be very well done. The paint room was neatly organized, with coatings shelved and labeled, such as for an individual school's preferred shade of schoolbus yellow. The lids were on the various containers of paint, i noted.

The booth was outfitted exhaust filters, and air intake filters, in a mat or panel style. The booth also has a Dwyer magnahelic gauge. Mr. Herrick explained the liquid for the tube had recently been replenished, and the gauge appeared to be in good condition. He indicated that he uses the gauge, but primarily relies on a visual check of the filters to determine when to change them.

The filters are changed typically every 2 weeks, I was told, but it also depends on how much coating they do. Changing the filters frequently has a benefit for the operator in the booth, Mr. Herrick said, as the fumes are exhausted more efficiently when the filters are cleaner, plus there is actually a reduction in the dirt that lands in a paint job.

Mr. Herrick explained that each year, he goes up on the roof to clean the louvres for the exhaust stack exit for the paint booth. With a flashlight, we looked inside the exhaust stack. He showed me how the metal louvres had recently been wiped clean, and I was able to contrast this with a tiny, uncleaned area at the end of each louver. It appeared that he was following a regular maintenance program for the booth, consistent with the MAPC Rule 287(2)(c)(ii) exemption criteria.

Facility recordkeeping:

Mr. and Mrs. Herrick showed me paint receipts for 2021 and 2022, for a random sampling of dates, in their office filing cabinets. Receipts for 2020 were stored in a box, to be relocated within their building, and it was explained that they store records for 7 years. I did not feel a need to see their longer term record storage, as the MAPC Rule 287(2)(c)(iii) exemption requires them to be stored for 2 years only.

Finding no violations or areas of concern, i left te site at 11:05 AM.

Post-inspection follow up:

I emailed the language of the MAPC Rule 287(2)(c) exemption to Mr. Herrick on 9/27/2022. Additionally, I emailed the AQD Permit Section a request to void the PTO on 9/27/2022. This was based on the facility appearing to satisfy the criteria of the MAPC Rule 287(2)(c) exemption for a surface coating line, e.g. a paint booth. The PTO was voided on 10/4/2022.

Conclusion:

No instances of noncompliance were identified, nor were there any areas of concern. The facility appeared clean and neat, with the paint booth well maintained. Additionally, the recordkeeping was well organized. The facility appeared capable of satisfying the MAPC Rule 287(2)(c) exemption for a surface coating line. PTO No. 136-81 was subsequently voided, on 10/4/2022.

NAME DATE 1/26/2023SUPERVISOR RB