

M3738

MAWILA

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

M373845960

FACILITY: JOE RICCI AUTO GROUP - Taylor Dealers Body Shop		SRN / ID: M3738
LOCATION: 12200 TELEGRAPH, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Kevin Gajewski , Body Shop Manager		ACTIVITY DATE: 09/27/2018
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled Inspection for FY 2018 and Complaint Investigation		
RESOLVED COMPLAINTS:		

AQD staff conducted a scheduled inspection for FY 2018 of Joe Ricci Auto Group, located in the City of Taylor. The purpose of the inspection is to determine the facility's compliance with applicable state and federal air pollution rules and regulations. Body Shop Manager, Kevin Gajewski accompanied AQD staff on the inspection.

Background:

Since at least 1978 there has been an automobile collision/body shop at this location. WC issued PTI C-4656 for a Binks Paint Spray booth on January 17, 1978. The most recent Certificate of Operation APC. 5-08920 (without conditions) was issued on 6/22/1987.

Complaint History:

The file shows 4 citizen odor complaints received between 2005 – 2018. All complaints were received from the same household located near by the facility. On August 9, 2005, a LOV was issued citing Rules 901 and 910 the company responded on August 16, 2005. Since that time all other complaints were investigated without verification of odorous emissions.

Process Description:

Joe Ricci Auto Group aka; Taylor Dealers Body Shop operates an automobile/truck body repair shop with 2 paint spray booths and body workshop. The facility repairs or replaces damaged body parts and/or prepares automobile body parts for painting using a high transfer efficiency paint spray gun. Painted parts are kept in the paint spray booth for curing. Painting is not a continuous operation and often small parts and vehicles are found in the booths. Booth #1 is a GFS Global Finishing Solutions a semi-down draft design with 2 banks of dry filters. One bank of filters in each corner of the far wall from floor to ceiling of the booth. Booth #2 is a Flo-Therm down draft design. Emissions from the spraying operation are exhausted through ductwork into a stack that goes through the roof of the building. Each booth has its own stack, both stacks are the same height, approximately 30 feet above ground and 10 feet above roof level. Filters are regularly changed.

Dirt and dust created by pounding, grinding, sanding or other body repairs are contained within the building. The shop floor is cleaned on a regular basis, preventing fugitive emissions from exiting the building.

The paint storage area is located in between the two paint spray booths, only water-based paint is applied.

Inspection Narrative:

Prior to this inspection odor surveillance was conducted on 9/5, 9/11 and 9/27 just before entering the facility to conduct this inspection. No odors were detected.

Body Shop Manager, Kevin Gajewski accompanied AQD staff as we walked through the shop to the southwest corner of the building where the paint spray booths are located. Neither paint spray booth had any parts in them at this time. A few hours earlier some small parts (bumpers and fenders) had been painted. That paint application would have taken approximately 20 - 30 minutes. There is not any additional painting scheduled for

today. Both booths are old but in very good condition, all paint filters were in place. Fans were started to demonstrate that each booth is operational. Whole cars are seldom painted, mostly small parts such as bumpers and fenders or quarter panels are painted and applications like these take normally 20 – 30 minutes at a time. The short duration of time that paint spraying is occurring makes it difficult for an inspector to be in the area at exactly the right time to perform an odor observation.

Dirt and dust created by pounding, grinding, sanding or other body repairs are contained within the building. The shop floor is swept on an as needed basis and is clean at this inspection. This reduces the chance of fugitive dust or dirt track-out escaping from the building.

The paint mix/storage area is located in between the two booths and with use of water base paints the area was odor free.

We stepped outside of the building by the southwest corner where the 2 stacks are clearly visible. The #1 booth had a stack repair about six months ago. Stacks are in very good condition and there are no obstructions such as overgrown trees nearby that could interfere with the exhausted gases.

An opacity observation was not performed since neither spray booth was in operation.

Post Inspection:

Upon return to the office, Mr. Gajewski talked about improvements made to the paint booths over the past few years. Paint booth #1 has upgraded all the electronic controls and installed a new fire suppression system. Paint booth #2 will be receiving the same upgrades later this year. During the slow time in December the two booths are given a complete mechanical and electrical inspection and any questionable parts are replaced.

The facility changed to the ENVRO BASE PPG System about 5 years ago. This is a total water base paint system. Although expensive to switch to water-base, it has proved to be a much better coating system. Better paint finishes, easier clean up, management and odor free.

Records of the paint purchases and paint filters are not kept in this office. Kevin will need a few days to gather that information and will email it to me. His estimate is that they use 30 – 35 gallons of paint per month. Paint filters are changed on a weekly basis.

Paint records for the year 2018 indicate a total of 407.69 gallons which is an average of 34 gallons per month (records attached).

Regulatory Summary:

Rule 287(2)(c) of the Michigan Air Pollution Control Rules exempts surface coating operations (paint spray booths) from the Permit to Install program if certain conditions are met. This Rule applies to this facility.

Operations that generate dirt and dust created by pounding, grinding, sanding or other body repairs are exempt under Rule 285(2)(l)(vi)(B) because those particulates are contained within the building. The shop floor is swept regularly preventing fugitive emissions from escaping the building.

Compliance Determination:

Based upon this inspection of the Joe Ricci Auto Group aka; Taylor Dealers Body Shop located in the City of Taylor, it appears this facility is operating in compliance with the applicable air quality rules and regulations.

Note:

WC issued PTI C-4656 for a Binks Paint Spray booth on January 17, 1978. The most recent Certificate of Operation APC. 5-08920 (without conditions) was issued on 6/22/1987. This equipment has been removed and the PTI can be VOIDED.

It is unknown when the Binks booth was removed, However, Booth #1 is about 25 years old and Booth #2 about 23 years old.

NAME *JK Krawiec*

DATE *4/5/19*

SUPERVISOR *JK*