

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

N241332225

FACILITY: SUNDANCE CHEVROLET		SRN / ID: N2413
LOCATION: 5895 E SAGINAW HWY, GRAND LEDGE		DISTRICT: Lansing
CITY: GRAND LEDGE		COUNTY: EATON
CONTACT: Randy Hall , Body Shop Manager		ACTIVITY DATE: 11/18/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, unannounced compliance inspection to determine compliance with PTI No 50-90 and other state rules		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Randy Hall, Body Shop Manager (bodyshop@sundancechevy.com)

Purpose: Conduct an unannounced, scheduled compliance inspection by determining Sundance's compliance with Michigan Air Pollution Control Rules and PTI No. 50-90 for a paint booth.

Facility Background/Regulatory Overview: Sundance Chevrolet is a car dealership. Their body shop is located near the back of the dealership property where Randy Hall, Body Shop Manager, said they do repair, priming, and painting work on all car parts that can be painted. They operate 6 days per week from 8 am – 5 pm and he said they can get approximately 3-4 jobs (cars) done per booth per day on average.

R. Hall said that Sundance has 2 paint booths now. The first one was installed after obtaining a permit to install in 1990. The second one he said was installed 2.5 years ago. Both booths are Devilbiss System 2000's.

Sundance is potentially subject to 40 CFR 63 (NESHAP), Subpart HHHHHH, because they are an area source of HAPS from a "Motor Vehicle and Mobile Equipment Surface Coating" operation; this regulation is only federally enforceable at this time. I sent R. Hall informational website links regarding the NESHAP so that he may determine if Sundance is regulated under this NESHAP.

Inspection: On November 18, 2015 at approximately 10:50 a.m., I arrived at Sundance Chevrolet's body shop. I met with Randy Hall, body shop manager, and provided him with a copy of PTI No 50-90, a permit to install exemptions handbook (July 2014), and a DEQ Environmental Inspections Rights and Responsibilities brochure.

There are currently 2 paint booths at Sundance Chevrolet body shop. The first one is permitted under PTI No. 50-90. The newer booth would be exempt from a Permit To Install (PTI) per Michigan Air Pollution Control Rule 287(c), under the conditional requirement that the coating use rate be not more than 200 gallons per month (minus water content), all exhaust systems serving the coating spray equipment have properly installed and operated particulate control, and the monthly coating use records be kept on file for the most recent 2-year period.

During the inspection I noted that each booth has fabric filter controls in both the ceiling and in the floor. R. Hall said their contractor, DHI, inspects and/or replaces the ceiling filters once per year and that these filters are what is required by the NESHAP HHHHHH. The floor fabric filters, R. Hall said, are replaced an average of 2 times per week by Sundance staff. The floor fabric filters in the permitted booth did not completely cover the exhaust opening and I mentioned this to R. Hall, who pointed out to the paint manager that filters should completely cover the exhaust opening. He explained to me that these are usually cut to the correct size. I made him aware that fabric filters must be installed properly and is a condition of the permit and of the exemption. R. Hall said they will ensure that the filters are cut to the correct size in the future. R. Hall and I went outside to observe the stack height for booth one. I saw no emissions coming from either stack during that time (painting was being conducted during that time).

PTI No 50-90

Monthly paint and reducer records are required to be kept for at least 2 years on booth 1. R. Hall provided me with October 2015 purchase records of all coatings, including reducers (see attached). Reducers are indicated in the purchase records as "balancer" or "binder." The coatings purchased are for both paint booths, according to R. Hall. Assuming that all coating purchased in October was used in October (which is not typically the case, according to R. Hall), the total number of gallons used would be 73.6. Paint booth 1 has a limit of 100 gallons applied (thinned paint) per month; the second booth, under R 287 (c), has a limit of 200 gallons per month (minus water). Because the number of gallons purchased for the month of October for both booths collectively is less than both the permit and exemption limits, Sundance is in compliance with this condition at this time.

Disposal of the spent paint booth filters are required to be disposed of in a manner which minimizes the introduction of air contaminants to the outer air. R. Hall explained that DHI removes and disposes of the ceiling filters. The floor filters are removed by Sundance staff and placed into a dumpster outside the facility. I explained to R. Hall that this must be done in a way to minimize particulate from being reintroduced into the atmosphere and recommended that they might put the spent floor

filters into a garbage bag before putting them in the dumpster to prevent any paint particulate from being released to the ambient air.

The stack from paint booth one is required to be at least 18 feet above ground, unobstructed and oriented vertically upward. R. Hall and I estimated that the stack was around 20' high, and discharges unobstructed vertically upward.

Additional Exempt Equipment

Cold cleaner – used to flush the paint guns

Sundance has a circular cold cleaner that is used to flush out paint guns for cleaning. Its air/vapor interface is approximately 1.3 ft² (~9" radius) and is therefore exempt from a permit to install per R 281(h), as the air/vapor interface is less than 10 ft². Part 7 Rules require that the cold cleaner have a lid that should be closed when the cold cleaner is not in use, and also the cold cleaner should have operating instructions posted nearby. Sundance has operating instructions present, but the cleaner did not have a lid. I informed R. Hall via email that a lid must be installed on the unit and kept closed when not in use. Compliance with this requirement will be revisited during a future inspection.

The paint booths are equipped with "burners." R. Hall explained that they dry the auto parts at a warmer than ambient temperature inside the paint booths once they've been painted (referred to as "burn cycles"). R. Hall said the burner itself is natural gas-fired and rated at 1 MMBTU/hr. This unit, the burner, is exempt per Rule 282(b)(i) for fuel-burning equipment which is used for indirect heating and only burns sweet natural gas at a rated heat input capacity of less than 50 MMBTU/hr.

Compliance Statement: At this time Sundance Chevrolet is in compliance with all state and federal regulations.

NAME Madison M. Lyall DATE 11-24-15 SUPERVISOR J. M.