

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

N264259702

FACILITY: J & L Collision, Inc.		SRN / ID: N2642
LOCATION: 25825 Gratiot Ave., ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Steve Watson ,		ACTIVITY DATE: 09/02/2021
STAFF: Adam Bogнар	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-Initiated Inspection		
RESOLVED COMPLAINTS:		

On September 2, 2021, Michigan Department of Environment, Great Lakes, and Energy– Air Quality Division (EGLE -AQD) Staff, I, Adam Bogнар conducted a self-initiated inspection of J&L Collision at 25825 Gratiot Avenue, Roseville, MI 48066. The purpose of the inspection was to determine the facility’s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules; and Permit to Install No. 842-90.

I arrived at the facility at around 12 pm. I met with Shannon, receptionist. I identified myself and stated the purpose of the inspection. Shannon gave me a tour of the facility. During the course of the inspection I met the manager, Mr. Steve Watson who accompanied us for part of the inspection.

J&L Collision is an automotive collision repair shop. The facility operates Monday through Friday from 8 am to 5 pm.

Permit to Install No. 842-90 was issued to J&L Collision on October 1, 1990 for an “Auto body repair process”.

There are two downdraft spray booths at J&L Collision. Both are controlled by fabric filters as required by Special Condition 18. These booths are used to paint automobiles after repair. Both booths are “spovens” because the spray area can turn into a curing oven. The filters in both booths appeared to be installed correctly with no gaps around the edges or tears in the filter.

Staff at J&L Collision explained that the 2nd paint booth had recently been installed. Permit to Install No 842-90 has a general condition stating, “The applicant shall not reconstruct, alter, modify, expand, or relocate this equipment unless plans, specifications, and an application for a Permit to Install are submitted to and approved by the Commission”. J&L Collision installed this second paint booth without notifying the AQD or submitting a permit application. This is a violation of PTI No. 842-90 General Condition 4.

This permit was issued to prior owners of this business; however, it is the current owner’s responsibility to comply with all conditions of the permit. I discussed this issue with AQD district supervisor Ms. Joyce Zhu. AQD will not issue a violation notice for this non-compliance as long as J&L Collision submits an administratively complete permit to install application by October 8, 2021. I communicated this timeline to J&L Collision on September 7, 2021 via email.

Furthermore, the two paint booths combined have a potential to emit a single hazardous air pollutant (HAPs) in quantities greater than AQD’s significance level of 10 tons per year. The new permit must contain an opt-out limit for HAPs in order for this facility to continue operating both coating booths.

The painter, Mark, explained that the filters in both booths are changed as needed based on the pressure drop across the filter. Mark turned on the blower for both booths to show me what the current pressure drop levels were. The older booth had a pressure drop of near 0 (required to be changed if greater than 0.25” water). The newer booth had a pressure drop of 0.02” water (required to be changed if greater than 0.1” water).

Mr. Watson provided me with coating usage records. I reviewed records from August 2020 to August 2021. These records show that a total of 109.76 gallons of combined coatings, reducer, & clearcoat were used between August 2020 and August 2021. Even if these coatings are assumed to have a VOC content of 10 lb/gallon (very high), the facility would have total annual VOC emissions of 0.5 tons. VOC emissions are less than 16.7 tons per year as required by Special Condition 14. Less than 4600 gallons of mixed paint is used annually as required by Special Condition 17.

Stacks appear to be exhausted vertically unobstructed in accordance with Special Condition 19. I did not notice any visible emissions during my inspection (Special Condition 15). AQD is not requesting verification of VOC emission rates pursuant to Special Condition 16 at this time.

Compliance Determination

J&L Collision must obtain an updated permit to install from the AQD for the two coating booths. Installing and operating the new coating booth without notifying AQD is a violation PTI No. 842-90 General Condition 4. I informed J&L Collision that they must submit an administratively complete permit to install application by October 8, 2021.

J&L Collision appears to be in compliance with all other requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules; and Permit to Install No. 842-90.

NAME Adam Bogros

DATE 9/14/2021

SUPERVISOR K. Kelly