

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

N264261211

FACILITY: J & L Collision, Inc.		SRN / ID: N2642
LOCATION: 25825 Gratiot Ave., ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Steve Watson ,		ACTIVITY DATE: 12/10/2021
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On December 10, 2021, Michigan Department of Environment, Great Lakes, and Energy– Air Quality Division (EGLE-AQD) Staff, I, Adam Bognar conducted a scheduled 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 Nos. 842-90 & 78-21.

I arrived at the facility at around 10 am. I met with Shannon, receptionist, and Mr. Steve Watson, Owner. I identified myself and stated the purpose of the inspection. Mr. Watson allowed me to inspect the facility.

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

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.

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 at. The older booth had a pressure drop of near 0.05” of water (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). The booth operator stated that the filters on both booths were replaced on 12/9/2021.

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

This permit was issued for a single coating booth. J&L Collision installed an additional coating booth a few years ago. During my previous inspection, I notified J&L Collision that installing the second coating booth at the facility means that they are excluded from using exemption rule 287(2)(c) for the second coating booth because it does not meet Rule 278 requirements. The booths together do not meet Rule 278 requirements because the potential to emit a single hazardous air pollutant (HAP) is greater than 10 tons per year.

The potential to emit (PTE) is determined by taking the Rule 287(2)(c) limit of 200 gallons per month per booth and multiplying that by the worst-case HAP content of 7.5 pounds per gallon, minus water, as applied. 400 total gallons per month equates to 4800 gallons per year. 4,800 gallons multiplied by 7.5 lbs/gallons equals 36,000 lbs of HAPs (18 tons).

To correct this issue, AQD required J&L Collision to obtain an HAP opt-out permit. HAP Opt-out Permit to Install No. 78-21 was issued to this facility on October 14, 2021.

During my previous inspection I reviewed coating 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.

I reviewed coating usage for September 2021, October 2021, and November 2021 during my inspection. Approximately 10 gallons of paint was used in each of those months.

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.

Permit to Install No. 78-21 (HAP Opt-out)

Special Conditions I.1 & I.2: Limits individual HAPs to 8.9 tons per year and aggregate HAPs to 22.4 tons per year. Shannon provided me with records showing that total HAP emissions for the 12-month period ending in November 2021 were 315 lbs. This is the only 12-month rolling period the facility is required to report at this time since the permit is newly issued.

Special Condition V.1: States that the permittee shall determine HAP content of coatings using EPA Test Method 311 if requested by the AQD district supervisor. AQD is not requesting Method 311 testing at this time.

Special Condition VI.1 & VI.2: Specifies recordkeeping requirements. J&L Collision must keep records of the gallons/lbs of each HAP containing material used (or reclaimed), the HAP content of each material, and individual and aggregate HAP emission calculations on a monthly and 12-month rolling basis.

J&L Collision maintains these records. I reviewed all of these while on site. HAP usage at this facility is much lower than their emission limit. To demonstrate compliance with these HAP limits, J&L Collision takes the total amount of coatings used each month and multiplies that by the highest HAP content coating used that month. Each month J&L Collision determines which coating has the highest HAP content and uses that for monthly calculations. These monthly calculations are summed up into 12-month periods.

This results in an overestimation of the amount of HAPs emitted each month. Even using this calculation method, total HAPs for the 12-month period ending in November 2021 were 315 lbs. This is much less than their annual limit of 8.9 tons of an individual HAP per 12-month rolling period. If J&L Collision ever exceeds an aggregate annual HAP emission of 8.9 tons using this method, then the facility will need to adjust their calculations to account for individual HAPs.

Mr. Watson is confident that this collision shop will never reach 8.9 tons per year of HAPs.

No violation notice was issued for failing to obtain an opt-out permit in a timely manner. To ensure that these records are being kept going forward, AQD is requiring J&L Collision to submit 12-month rolling HAP emission records each month until April 2022.

Compliance Determination

J&L Collision appears to be in 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 Nos. 842-90 & 78-21.

NAME Adam Bogner

DATE 12/21/2021

SUPERVISOR K. Kelly