

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

N350223832

FACILITY: Dick Huvaere's Richmond Chrysler Plymouth Dodge		SRN / ID: N3502
LOCATION: 67567 SOUTH MAIN STREET, RICHMOND		DISTRICT: Southeast Michigan
CITY: RICHMOND		COUNTY: MACOMB
CONTACT: mike Tomlinson , Body Shop Manager		ACTIVITY DATE: 11/22/2013
STAFF: Joyce Zhu	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: Annual inspection		
RESOLVED COMPLAINTS:		

On Nov. 26, 13, I conducted an annual inspection at Dick Huvaere's Richmond Chrysler Plymouth Dodge, located on 67567 S. Main St., Richmond. I arrived at the site around 10:08 PM. I introduced myself to Mr. Ken Kline, the assist service manager from the company, & explained the purpose of the inspection.

AQD's file indicates that the company used to use halogenated solvent in the part washer; however, the company later indicated that they no longer used any of the halogenated solvents. In addition, there is a permit (#472-92) issued to the location for a spray booth.

Inspection:**Cold Cleaners**

There are two cold cleaners (or part washers) onsite. One is located in the Service Shop; the other, in another Service Building. Both units have equipped with draining devices. During the inspection, the units were covered. They no longer use any halogenated solvents. Only mineral sprite is used in those units. Those units are exempted from the permit requirement according to Rule 285 (r) (iv). I gave the company the sticker of operating procedures for the cold cleaners pertaining to Rule 611 and 707.

Permit (#472-92)

This permit covers a paint spray booth. Ken told me that there's no spray booth on this site; however, there were couple in the body shop which was on 66629 Gratiot, Richmond. Arriving at the body shop around 10:30 AM, I met with Mr. Mike Tomlinson, the Body Shop manager. He took me to see the booths. During the inspection, one of the booths appeared to be clean; there was some overspray in the other booth. HVLP applicators were used in the coating operation. According to the company, they replaced the filters every month and half. They used water base paints. All paints were stored in the paint mixing room. I didn't smell any solvent in the room; however, I saw some dry paint spots inside the room. They mix the paints according to manufacturer's recommendation. There were two cold cleaners (part washers) inside the room. The cold cleaners were use to clean the spray guns. Each unit equipped with a draining device. The units were covered by lids. MSDS of the solvent used in the cold cleaners reveals no halogenated solvents were used in the cold cleaners. I also gave Mike the sticker of operating procedures for the cold cleaners pertaining to Rule 611 and 707. The company submitted paint usage record. According to the record, they used less than 200 gallons of paints as a whole during half year period. The two booths are exempted from the permit requirement according to Rule 287(c). Because there are two booths in the Body Shop, the potential coating usage can be as high as 400 gallons per month allowed by Rule 287. Let's taking worst case scenario, rule of thumb of VOC content of coatings is 7.36 lb/gal. The potential of VOC emission can be as high as 1.5 tons per month; as a result, the emission during 12-month rolling time period, could be about 18 tons. Because the company has not taken any restrictions on HAP emissions, the VOC emission could be treated as single HAP emission. This will put the company into the major source category. I explained the scenario to the company & advised the company about Rule 208(a) registration option to get out of Title V obligation. Since there is no booth located at 67567 S. Main St., Richmond, I'll void the permit.

In conclusion, the company appeared to operate in compliance with Air Quality Regulations as soon as the company submits the Rule 208(a) registration.

NAME Joyce Zhu

DATE 12/11/13

SUPERVISOR CTE