

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

FY 2015 Insp

N369127813

FACILITY: Gerber Collision and Glass	SRN / ID: N3691
LOCATION: 3055 W MAPLE ST, COMMERCE TWP	DISTRICT: Southeast Michigan
CITY: COMMERCE TWP	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 11/07/2014
STAFF: Iranna Konanahalli <i>JK</i>	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of Gerber Collision and Glass ("Gerber")	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

File: N3691 - SAR - 2014 11 07

**Gerber Collision and Glass (N3691)
3055 East West Maple Road
Commerce Twp., Michigan 48390-3845**

**Name change: Dwyer & Sons. (N3691) → Adrian's Collision Center (2013)
→ Gerber Collision and Glass (2014). The collision shop has nothing to
with the dealership (European car dealer Dwyer and Sons is out of the
building; now [Nov 2014] La Fontaine Subaru)**

Permit-to-Install No. 347-93 dated April 23, 1993.

**Subject to: NESHAP / MACT 6H, 40 CFR, Part 63, Subpart HHHHHH,
National Emission Standards for Hazardous Air Pollutants: Paint Stripping
and Miscellaneous Surface Coating Operations at Area Sources; Final
Rule (Page 1738 Federal Register / Vol. 73, No. 6 / Wednesday, January 9,
2008 / Rules and Regulations / Final Rule). The NESHAP is for area
sources engaged in paint stripping, surface coating of motor vehicles and
mobile equipment, and miscellaneous surface coating operations. AQD
has decided not to take delegation of these standards and therefore no attempt
has been made evaluate Gerber's compliance with NESHAP / MACT 6H.**

**Not Subject to: NESHAP/ MACT T, area source National Emission
Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40
CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal
Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations;
amended National Air Emission Standards for Hazardous Air Pollutants:
Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule;
Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 /
Rules and Regulations**

On November 07, 2014, I conducted a level 2 self-initiated inspection of Gerber Collision and Glass ("Gerber") located at 3055 East West Maple Road, Commerce Twp., Michigan 48390-3845. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act,

1994 PA 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules; and PTI No. 347-93.

During CY 2013 Adrian's Collision Centers operates the collision shop for Dwyer. Now (Nov 2014), Gerber Collision and Glass ("Gerber") operates the collision shop independent of the dealership. Gerber bought Collex Collision about 2014.

During the inspection, Mr. Michael Walker (Phone: 248-295-2079; Fax: 248-295-2094), body shop manager, assisted me. Mr. Leon Kharnoulina, painter also helped.

Mr. Steve Gruber and Mr. Lance Knudsen, former managers, separated from the dealership, Dwyer and Sons.

This is an automotive body-shop. There are two paint spray booths for air-dried paints. One of the two booths is permitted (PTI No. 347-93). While the permitted booth (Blowtherm) paints whole car, unpermitted booth (Global Finishing Solutions) paints parts such as hoods, fenders, doors, etc. Both booths are equipped with downdraft filters on the floor. Magnehelic pressure drop meter is present on the main booth. During the FY 2013 inspection (12/10/2012), the reading on the Magnehelic was 0.2 inches of water after starting the fan. During the FY 2015 inspection the booths were under renovation. The filters are changed when the pressure drop is between 0.35-0.4 inches of water. Gerber performs most painting job in Blowtherm booth; mostly prep-work, sanding, priming takes place in Global Finishing Solutions booth.

Being a collision shop, paint usage is much less than 200 gallons per month (Rule 336.287(c)). Mr. Mike Walker stated that 10-15 gallons of paint per month is used between two booths; the usage reduced from 40-50 gallons per month. Business volume has come down.

PTI No. 347-93 limits the booth to 5.6 tons of VOC per year. The body shop discontinued keeping VOC records when Mr. Knudsen separated. I asked Mr. Gruber to keep the VOC records using a spreadsheet based upon the paint inventories and purchases. Also, I asked Mr. Walker to keep paint & solvent usage and VOC records on December 10, 2012 and November 2014. Mr. Walker stated that Gerber buys paints and solvents exclusively from PPG. PPG has all records on a web-based database.

Basecoat coatings are mostly water-based. Clearcoat coatings are always solvent based. Primer coatings are both solvent and water based.

Gerber emits about 1 ton of VOC per year (SC15 limit: 5.6 tpy VOC)

The stack is about 30 feet tall with a rain sleeve; the exhaust is discharged

vertically upwards.

I asked Mr. Walker to install the filters properly. I asked Mr. Walker to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. I also asked him to keep records of paint and solvent usage according to Rule 336.287(c). The records via PPG database are acceptable.

Solvent distillation still

One solvent distillation still of 5 gallon capacity is removed.

One parts washer

Adrian's took old parts washer.

There is one parts washer. Herkules paint gun washer consists of water-based washer on left half side and solvent cleaner on right half side. Shopline Universal Thinner solvent capacity is 5 gallon. The lid was closed during the FY 2015 inspection. No halogenated solvent is used. Each cold-cleaner is subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Solvent is supplied by PPG. When solvent is dirty it is shipped to an off-site facility for solvent reclamation.

PPG Industries (800-647-8050) General Purpose Solvent JT501

100% VOC solvent: 30-60% Toluene, 10-30 methanol, 7-13% acetone, 5-10% Ligroine. Flash Point (FP) = 22 °F TCC. Auto Ignition = NA °F. Boiling Point (BP) = 100 °F @ 760 mm Hg. Vapor Pressure (VP) = 84 mm Hg at 68 °F (11.2 kPa or kilo Pascal). Specific Gravity (SG, Water = 1.0) = 0.83. Density (ρ) @ 68 °F = 6.93 lbs / gallon (NA kg /L). Flammability range = 2.3 %v (LEL) – NA%v (UEL).

I showed Mr. Walker NESHAP / MACT 6H regulations, training materials, etc. on DEQ's web site.

Conclusion

About 1 ton per year VOC emissions.

NAME

J. Stenmark

DATE

11/18/2014

SUPERVISOR

CTE