

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

N3691

N369135381

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: 06/15/2016
STAFF: Iranna Konanahalli <i>IK</i>	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2016 inspection of Gerber Collision and Glass	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

N3691 - SAR - 2016 06 15

**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). Gerber has nothing to with the dealership (European car dealer Dwyer and Sons is out of the building; La Fontaine Subaru [Since Nov 2014])

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

As US EPA approved an exemption, NOT 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. Besides, US EPA approved, via the March 11, 2005, letter (from Ms. Sara J. Breneman, Chief Air Enforcement and Compliance Assurance Branch, US EPA Region V, Chicago to Mr. Tim O'Day, Gerber Collision, Skokie, Illinois) exemption from NESHAP / MACT 6H for spray coatings; other requirements may apply, e.g., methylene chloride paint stripping if performed. Pursuant to 40 CFR, Part 63, § 63.11170(a)(2), Gerber demonstrated that it does not use in its spray coatings the target hazardous air pollutants (target HAP) as defined in 40 CFR, Part 63, § 63.11180. On December 15, 2014, Gerber signed a certification in its petition that none of the coatings it sprays in Michigan contain target HAP. Gerber's all fifteen (15) facilities in Eastern Michigan are affected by this determination.

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 June 15, 2016, 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 operated the collision shop for Dwyer. Since November 2014, Gerber Collision and Glass ("Gerber") operates the collision shop independent of the dealership. Gerber bought Collex Collision about 2014. Gerber operates 320 collision shops in US and Canada. In addition, Gerber operates ≈40 collision shops in Michigan.

During the inspection, Mr. Charles (Chuck) Yager (Phone: 248-669-1075; Fax: 248-669-1192; E-mail: Charles.Yager@GerberCollision.com), General Manager, assisted me.

Mr. Michael Walker (Phone: 248-295-2079; Fax: 248-295-2094), body shop manager, separated about April 2015. About May 2015, Yager replaced Walker. Mr. Steve Gruber and Mr. Lance Knudsen, former managers, separated from the dealership, Dwyer and Sons.

This is an automotive body-shop. There are three (3) paint spray booths for air-dried paints. One of the three booths is permitted (PTI No. 347-93). While the permitted booth (Blowtherm) paints whole car, unpermitted booths (2) (Global Finishing Solutions) paint parts such as hoods, fenders, doors, etc. While Blowtherm booth is enclosed on all sides with hard walls, Global Finishing Solutions booths (2) are equipped with curtains as enclosures on front side. All three (3) booths are equipped with downdraft filters on the floor. Magnehelic pressure drop ( $\Delta P$ ) gauge is present on the main booth (Blowtherm). During the FY 2016 inspection (06/15/2016), the reading on the Magnehelic was 0.3 inches of water after starting the fan. About November 2014, Gerber renovated the booths. The filters are changed when the pressure drop is between 0.35-0.4 inches of water. Gerber performs most painting jobs in Blowtherm booth; mostly prep-work, sanding, priming takes place in Global Finishing Solutions booths (2).

Being a collision shop, paint usage is much less than 200 gallons per month (Rule 336.287 (c)). Mr. Yager stated that 10-20 gallons of paint per month are used among three booths; the usage reduced from 40-50 gallons per month. Business volume has come down.

PTI No. 347-93 limits the permitted booth (Blowtherm) to 5.6 tons of VOC per year. The body shop discontinued keeping VOC records when Mr. Knudsen separated. I asked Mr. Yager to keep the VOC records using a spreadsheet based upon the paint inventories and purchases. Mr. Yager stated that Gerber buys paints and solvents exclusively from PPG. PPG has all purchase records on a web-based database. I asked Mr. Yager to transfer the purchase data, pertaining only to coatings and solvents, from PPG web-based database to MS Spreadsheet and perform the required usage and VOC calculations.

Basecoat coatings are mostly water-based. Clearcoat coatings are always solvent based. Primer coatings are both solvent and water based. Primer surfacer (filler and sealer) is always solvent based.

Gerber emits about 2 tons of VOC per year (PTI No. 347-93, 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. Yager to install the filters properly. I asked Mr. Yager 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 and calculations using MS Spreadsheet 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 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 Pascals). Specific Gravity (SG, Water = 1.0) = 0.83. Density ( $\rho$ ) @ 68 °F = 6.93 lbs / gallon (NA kg /L). Flammability range = 2.3 %v (LEL) – NA%v (UEL).

### Conclusion

About 2 tons per year VOC emissions (PTI No. 347-93, SC15 limit: 5.6 tpy VOC). US EPA approved exemption from NESHAP / MACT 6 H for coatings (no target HAP in the PPG coatings).

NAME Blennemahad DATE 07/06/2016 SUPERVISOR CJE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 11 2015

REPLY TO THE ATTENTION OF:

Mr. Tim O'Day  
Gerber Collision & Glass  
8250 North Skokie Blvd  
Skokie, Illinois 60077

Re: Exemption from 40 C.F.R. Part 63, Subpart HHHHHH

Dear Mr. O'Day:

This letter is in response to your petition dated December 15, 2014, requesting an exemption for the fifteen Gerber Collision & Glass facilities located in the eastern Michigan, from the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at 40 C.F.R. Part 63, Subpart HHHHHH. A listing of the facilities for which Gerber Collision & Glass is requesting an exemption is attached.

To obtain an exemption, 40 C.F.R. § 63.11170(a)(2) requires that as the owner or operator of a motor vehicle and mobile equipment surface coating operation you demonstrate, to EPA's satisfaction, that you spray apply no coatings that contain the target hazardous air pollutants (HAP), as defined at 40 C.F.R. § 63.11180. The petition must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP.

Based upon the information provided in your petition and signed certification dated December 15, 2014 that none of the coatings sprayed at the facilities contain the target HAP, Gerber Collision & Glass's Michigan facilities are exempt from Subpart HHHHHH requirements for its spray-applied coating activities. Please note that other provisions of Subpart HHHHHH may still apply to your facilities, such as the provisions applicable to paint stripping operations involving the use of chemical strippers containing methylene chloride.

Keep a record of this exemption on site at each of your facilities for as long as you perform motor vehicle and mobile equipment surface coating operations. If circumstances change such that one or all of your facilities intend to spray apply coatings containing any target HAP, the owner or operator must submit the initial notification required by 40 C.F.R. § 63.11175 and comply with the requirements of this subpart.

This exemption is based on information that you have provided to us. Nothing in this exemption shall be construed as limiting the ability of EPA or delegated agencies to pursue enforcement action, if it is determined that your facility was not eligible for this exemption or for any other violations under the Clean Air Act. Providing false information to a federal official is a criminal violation pursuant to federal law, 18 U.S.C. § 1001.

If you have any questions regarding this response, please contact Daniel Schaufelberger at (312) 886-6814.

Sincerely,

A handwritten signature in cursive script that reads "Sara Breneman".

Sara J. Breneman  
Chief  
Air Enforcement and Compliance Assurance Branch

Enclosure

cc: Tom Hess, Enforcement Unit Manager  
Air Quality Division  
Michigan Department of Environmental Quality

## Gerber Collision & Glass stores (formerly Collex Collision Experts) in Eastern Michigan

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1. Gerber Collision & Glass – Ann Arbor, 3345 Washtenaw Ave, Ann Arbor, MI 48104 ✓
2. Gerber Collision & Glass – Clawson, 165 W 14 Mile Rd, Clawson, MI 48017 ✓
3. Gerber Collision & Glass – Clinton Twp, 44700 Enterprise Dr, Clinton Twp, MI 48038 ✓
4. Gerber Collision & Glass – Commerce Twp, 3055 E West Maple Rd, Commerce Twp, MI 48390 ✓
5. Gerber Collision & Glass – Livonia, 11727 Merriman Rd, Livonia, MI 48150 ✓
6. Gerber Collision & Glass – Novi, 25100 Novi Rd, Novi, MI 48375 ✓
7. Gerber Collision & Glass – Orion, 921 Brown Rd, Orion, MI 48359 ✓
8. Gerber Collision & Glass – Rochester Hills, 1998 Rochester Industrial Dr, Rochester Hills, MI 48309 ✓
9. Gerber Collision & Glass – Roseville, 29187 Gratiot Ave, Roseville, MI 48066 ✓
10. Gerber Collision & Glass – Sterling Heights, 6227 15 Mile Rd, Sterling Heights, MI 48312 ✓
11. Gerber Collision & Glass – Warren, 13741 9 Mile Rd, Warren, MI 48089 ✓
12. Gerber Collision & Glass – Washington, 62386 Van Dyke Rd, Washington, MI 48094 ✓
13. Gerber Collision & Glass – Waterford, 1630 Airport Rd, Waterford, MI 48327 ✓
14. Gerber Collision & Glass – Wayne, 38970 Michigan Ave, Wayne, MI 48184 ✓
15. Gerber Collision & Glass – Woodhaven, 23965 Allen Rd, Woodhaven, MI 48183 ✓