

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

N560047629

FACILITY: Collision Craftsmen		SRN / ID: N5600
LOCATION: 14080 23 MILE RD, SHELBY TWP		DISTRICT: Southeast Michigan
CITY: SHELBY TWP		COUNTY: MACOMB
CONTACT: Marco Grossi , Owner		ACTIVITY DATE: 01/14/2019
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On January 14, 2019, Michigan Department of Environmental Quality – Air Quality Division (MDEQ-AQD) Staff, I, Adam Bognar conducted an unannounced targeted inspection of Collision Craftsmen (“facility”) located at 14080 23 Mile Rd, Shelby Charter Township, MI 48315. 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 Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules; and General Opt-out Permit to Install No. 148-06 (“Permit”).

Contact: Marco Grossi (Owner)
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http://collisioncraftsmen.com/

Permit to Install No 148-06 was issued to Maaco Collision Repair & Auto Painting on May 15, 2006. There have been multiple changes in ownership since this permit was issued. The current owner (Collision Craftsmen) has been operating at this location for around 10 days. The previous owner was “Premier Autobody Repair & Painting”.

I arrived at the facility at around 10:30 am. I met with Mr. Marco Grossi, owner. I identified myself, provided credentials, and stated the purpose of the inspection. Mr. Grossi gave me a tour of the facility. After the facility tour we sat down and discussed the requirements of Permit to Install No. 148-06.

Inspection

Collision Craftsmen is an automotive collision repair shop. There are 7 employees operating Monday through Friday from 8 am to 5 pm. Collision Craftsmen began operating at this facility on January 4, 2019. The booths and equipment at this facility is leftover from previous tenants. Collision Craftsmen has not installed any new major equipment.

Two semi-downdraft spray booths are in operation. The booths are used to paint automotive parts/cars using paint guns. The intake air enters from the top of the booth and is exhausted through dry exhaust filters located in the side walls of the booth. The dry exhaust filters in both booths were in place and appeared to be functioning properly. The filters were relatively clean and the Magnahelic pressure drop gauge read 0.25 psi across each booth filter. Mr. Grossi estimated that the exhaust filters will need to be changed every few weeks. Booths are equipped with HVLP applicators pursuant to permit condition FG-COATING IV-1.

There is a paint mix room used as a staging area for the spray booths. This area was clean and organized during my inspection. All paint cans had their lids closed. The paint mix station includes a scale and a computer. Individual paint components are weighed to create the correct mixture for the job. Each time an amount of paint is added to a mixture, that amount is entered into the computer. In this way, Collision Craftsmen has a record of all paint used at the facility.

There is a 55-gallon drum in this area used to store waste thinner/paint. The funnel lid on this 55-gallon drum was left open. I asked Mr. Grossi to keep the funnel lid closed at all times when not in use. I will follow up with Mr. Grossi in about a month to see what method he will use to properly dispose of this thinner/paint waste.

Also located in the mix room, there is one Herkules gun washer (cold cleaner) used to clean guns between jobs. During my inspection, proper usage instructions were posted and the lid was closed. Lacquer thinner is used as the cleaning solvent. The air/vapor interface is approximately 2'x2'. This cold cleaner appears to be exempt from Rule 201 requirements pursuant to Rule 281 (2)(h) because it has an air/vapor interface smaller than 10 square feet.

A portable dust collector (large vacuum) was recently purchased to capture dust generated from sanding/grinding operations. The dust collector was still in the box. Sanding/grinding is currently exhausted to the in-plant environment. The dust collector was purchased to reduce the amount of dust on the shop floor. Grinding, sanding, and other machining operations appear to be exempt from Rule 201 requirements pursuant to Rule 285 (2)(l)(vi) if they are either exhausted indoors or through an appropriately designed and operated dust collector.

Permit to Install No. 148-06

After the inspection, Mr. Grossi and I reviewed the conditions of Permit to Install No. 148-06. Mr. Grossi was not aware of the air Permit to Install associated with this location. I informed him that although Collision Craftsmen just began operation, he is still subject to all the requirements of permit to install No. 148-06 because Collision Craftsmen operates the same equipment at the same location.

Permit condition FG-COATING V-1 specifies that EPA Method 24 (or other EPA approved method) testing shall be performed on any coating if requested by the MDEQ-AQD. EPA Method 24 tests coatings for VOC content, water content, density, volume of solids, and weight of solids. If the EPA Method 24 values differ from formulation values, then Collision Craftsmen shall use the EPA Method 24 values. The MDEQ-AQD is not requesting any Method 24 or other testing at this time.

Permit Condition FG-COATING VI-3 & 4 establish recordkeeping requirements. Collision Craftsmen must keep records of all purchase orders and invoices for coatings/solvent used at the facility, the VOC content of each coating/solvent, chemical composition data for each coating/solvent, and the gallons used of each coating/solvent. Additionally, Collision Craftsmen must use this data to generate records of monthly VOC emissions and 12-month rolling VOC emissions for each coating line.

Some of this information was unavailable because Collision Craftsmen began operating less than one month ago. Mr. Grossi has kept detailed records of all coating/solvent used in the facility since operation began. These records include both the gallons of coating/solvent used and the VOC content of the coating/solvent. Mr. Grossi provided me with all of the purchase orders and invoices since operation began. According to the records I reviewed, Collision Craftsmen purchased approximately 8 gallons of paint since operations began. Records detailing the chemical composition of each material are kept on-site in the form of digital safety data sheets (SDS). Mr. Grossi mentioned that he plans to get physical copies of SDSs but has not had time yet.

VOC emissions are not currently calculated, although the information needed to determine VOC emissions was available during my inspection. I explained all of the recordkeeping requirements of the permit to Mr. Grossi and asked him to begin calculating and recording the VOC emissions from each coating line every month and for each 12-month rolling period. Additionally, facility-wide VOC emissions need to be calculated on a 12-month rolling time period. Facility-wide emissions will be determined by summing the emissions of both spray booths, evaporative loss from the parts washer, and any other VOC that is evaporated at this facility.

I will request these records after Collision Craftsmen has been operating for one month. I informed Mr. Grossi that by mid-February 2019, I will expect to see records demonstrating that Collision Craftsmen is in compliance with all recordkeeping and other requirements of PTI No. 148-06.

Exhaust gases from FG-COATING (booths) are required to be discharged vertically upwards to the ambient air at exit points not less than one and a half times building height. Exhaust stacks appeared to meet these requirements. I did not climb to the roof to verify stack parameters.

Mr. Grossi stated that he does not currently plan to add any additional equipment to this facility. He has everything he needs for now. If any new equipment is purchased, or if any modifications are made to existing equipment, then Collision Craftsmen should notify the MDEQ-AQD of the change. A modification to PTI No. 148-06 may need to be made to reflect the new equipment or equipment modification.

I left the facility at around 11:30 am.

Compliance Determination

This facility 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 Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules; and Permit to Install No. 148-06.

NAME

Adam Bogner

DATE

1/18/2019

SUPERVISOR

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