

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

*FY 2015 Insp.*

N668928565

FACILITY: TAMAROFF BUICK HONDA INC	SRN / ID: N6689
LOCATION: 28587 TELEGRAPH ROAD, SOUTHFIELD	DISTRICT: Southeast Michigan
CITY: SOUTHFIELD	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 02/12/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of Tamaroff Motors, Inc.	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

*N6689-SAR-2015 02 12*

**Tamaroff Motors, Inc. (N6689)**  
28587 Telegraph Road  
Southfield, Michigan 48034-7507

**Name change: Tamaroff Buick Honda, Inc. (2007) → Tamaroff Honda-Nissan (2010) → Tamaroff Motors, Inc.**

**Phone: 1-800-TAMAROFF**

**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 Tamroff'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. Tamaroff does not use halogenated organic compounds.

**Cat III Fee:** About 2011, AQD removed Tamroff Motors, Inc. from Category III Air Quality Fee list because halogenated organic compounds are not used and, hence, Tamaroff is not subject to NESHAP/ MACT T. AQD conducted an inspection (FY 2011) to follow-up on Mr. McGeen's questions.

On February 12, 2015, I conducted a level-2 self-initiated inspection of Tamaroff Motors, Inc., ("Tamaroff") located at 28587 Telegraph Road, Southfield, Michigan 48034-7507. 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; and Michigan Department of Natural Resources and Environment, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Doug Jespersen (Phone: 248-223-8411; Main Phone: 248-353-1300; Fax: 248-353-8559; Email: Jespersen@tamaroff.com), Body Shop Manager, and Mr.

Andy Haas (Phone: 248-223-8208; Main Phone: 248-353-1300; Fax: 248-223-8487; Email: AHaas@tamaroff.com), Service Manager, assisted me.

Mr. Chris Woods (Phone: 248-223-8208; Main Phone: 248-353-1300; Fax: 248-223-8387) did not participate.

As General Motors sold Buick franchise to Art Moran, Tamaroff removed from its name Buick and added Nissan. Tamroff started selling and servicing Nissan cars as well along with Honda Cars.

### **Three paint spray booths with dry filters**

Three practically identical collision shop paint spray booths with downdraft dry filters are present (two DeVilbiss Concept and one DeVilbiss System 2000). Each booth is equipped with an intake air filter system at the top to ensure enhanced finish. Each booth is equipped with pressure drop ( $\Delta P$ ) monitoring dial gauge to monitor  $\Delta P$  across filter system to assist in decisions to change the filters.

About 30 gallons of paint per month (15 gal BC plus 15 gal CC) is used based upon estimates although the usage record is not kept. The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c). I asked Mr. Jespersen to install the downdraft 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.

Almost all basecoat (BC) paints are water based. Solvent-based clearcoat (CC) paints are continued to be used.

Waste solvents are not recovered since all basecoat coatings are water-based and solvent-based clearcoat coatings are common to all cars / trucks. 55-gallon drum is present to collect coating process wastes for disposal according to RCRA non-hazardous wastes.

### **NESHAP / MACT 6H: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

During the FY 2015 inspection, I showed Mr. Doug Jespersen, NESHAP / MACT 6H fact-sheet, video training materials, notification forms (Initial & Final Compliance Status). A copy of Initial Notification dated December 9, 2009, is attached.

### **3 Parts / cold cleaners Graymills**

Three (1 of 4 removed about 2012) 4 ft. \* 3 ft. parts / cold cleaners (Graymills) are present. All lids were closed during the inspection when not operating. The lids are mechanically assisted. It may be described as "sink-on-drum" cold-cleaner. Spray wash is present. 16-gallon drum is present to collect solvent that drains into it from the sink.

Petroleum hydrocarbons solvent is used as cleaning solvent. 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.

As the operating procedures were not posted, on February 12, 2015, I gave DEQ's decals for

"cold-cleaner operating procedures" for posting and complying with work-practice rules.

No halogenated solvent is used. The Cold-cleaners are NOT Subject to: NESHAP/ MACT T since solvents containing halogenated compounds are not used.

Vesco services the units once per month.

Vesco Oil (800-356-3560) supplies the solvents and services the cold-cleaners. Petroleum Hydrocarbons containing no halogenated solvents is used. Once a month, dirty solvent is picked up for disposal or recovery according to RCRA.

Vesco Oil Solvent: Citgo Product No. 8052-41-3.

100 % VOC Petroleum Hydrocarbons: 30-60% C9-C15 cycloalkanes; 15-40% C9-C15 alkanes; 15-40% C9-C15 Aromatics.

Flash Point (FP) = 108 °F. Auto Ignition = 446 °F. Boiling Point (BP) 315 – 425 °F. Vapor Pressure (VP) = 0.2 mm Hg at 68 °F. Specific Gravity (Water = 1) = 0.79. Density ( $\rho$ ) @ 68 °F = 6.59 lbs. / gallon (0.79 kg /L.). Flammability range = 0.5 %v (LEL) – 6%v (UEL).

### Conclusion

About 2011, AQD Tamaroff removed from Category III Fee list as MACT T solvents (halogenated) are not used.

NAME J. S. Wernick DATE 02/17/2015 SUPERVISOR CTE



Initial Notification  
For Paint Stripping and Miscellaneous Surface Coating Operations  
Area Source Rule  
40 CFR Part 63, Subpart HHHHHH (Parts 63.11169-63.11180)

Please review the Instruction Sheet before completing this form. Please print or type all information.

**A.1 Company Information**

Company Name: <i>TAMAROFF MOTORS INC</i>	Telephone Number: <i>248-353-1300</i>
Mailing Address: <i>28585 TELEGRAPH RD</i>	Fax Number: <i>248-353-8559</i>
City: <i>SOUTHFIELD</i>	State: <i>MI</i> Zip: <i>48034</i>

Please check whether the area source is a new or existing source:       New Source       Existing Source  
(refer to Instruction Sheet definitions)

**A.2 Owner/Operator Information**

Name: <i>DOUG JESPERSEN</i>	Telephone Number: <i>248-353-1300</i>
Mailing Address: <i>28585 TELEGRAPH RD</i>	Email: <i>JESPERSEN@TAMAROFF.COM</i>
City: <i>SOUTHFIELD</i>	State: <i>MI</i> Zip: <i>48034</i>

Please check whether the person listed above is the owner or operator of the area source:       Owner       Operator

**A.3 Facility Location Information (If different from Company Information)**

Company Name:	County:
Street Address:	State:
City:	Zip:

Is the source a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location?       Yes       No

**A.4 Identification of Regulatory Standard**

I understand that I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Please initial here *DAS*



A.5 Surface Coating		Enter number of each		
		Spray booths	Prep stations	Painters
<input checked="" type="checkbox"/> Yes	Do you surface coat motor vehicles or mobile equipment? (see definition)	2	0	3
<input type="checkbox"/> No				

A.6 Surface Coating		Enter number of each		
		Spray booths	Prep Stations	Painters
<input type="checkbox"/> Yes	Do you surface coat miscellaneous metal and/or plastic parts? (see definition)			
<input checked="" type="checkbox"/> No				

A.7 Paint Stripping Operations	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Do you use paint strippers containing Methylene Chloride (MeCL)? Go to Part B.1 if you answer "No."
Methods of paint stripping employed (check all that apply) <input type="checkbox"/> Chemical <input type="checkbox"/> Mechanical <input type="checkbox"/> Other (please describe):	
Substrates stripped (check all that apply) <input type="checkbox"/> Wood <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Other (please describe)	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Do you/will you use more than 1 ton of MeCL annually?

**B.1 Compliance Verification Statement**

I certify the truth, accuracy, and completeness of this notification. The source has complied with all the relevant standards of this subpart. This initial notification also serves the notification of compliance status.

Certifying Official:  Owner  Operator (check one)

DOUGLAS A JESPERSEN BODY SHOP MANAGER  
 Name of Certifying Official (print or type) Title

[Signature] BODY SHOP MANAGER  
 Signature of Certifying Official Title

Please make a copy of this Initial Notification and submit the original signed copy by U.S. mail, or by another courier, to the U.S. Environmental Protection Agency (USEPA) Region 5 office at the following address:

USEPA Region 5  
 Compliance Tracker (AE-17J)  
 77 West Jackson Blvd.  
 Chicago, IL 60604

# NESHAP INITIAL NOTIFICATION COMPLIANCE STATUS FORM

With regards to Compliance for Surface Coating (A.5 & A.6):

PLEASE CHECK ONE

- A) The source is currently in compliance with each of the stated requirements
- B) The source currently is NOT in compliance with the requirements, but will be in compliance with the requirements by the compliance date *(See Table 1.1 Below)*

With regards Compliance Certification for Methylene Chloride (MeCL) Paint Stripping (A.7):

PLEASE CHECK ONE

- A) The source is currently in compliance with each of the stated requirements
- B) The source currently is NOT in compliance with the requirements, but will be in compliance with the requirements by the compliance date *(See Table 1.1 Below)*

IF you have checked box A in either or both statements above, provide certification of compliance by the responsible company official and a statement that this initial notification also serves as the Facilities Notification of Compliance Status *(See Table 1.1 Below)*

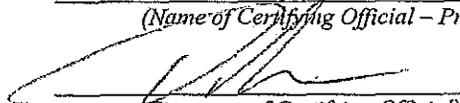
Table 1.1	
SOURCE TYPE	COMPLIANCE DATE
New Source (startup after 1/9/08)	Date of Startup
New Source (startup after 9/17/07 but before 1/9/08)	1/9/2008
Existing Source (startup on or before 9/17/07)	1/10/2011

DOUGLAS A. JESPERSEN

*(Name of Certifying Official - Print)*

BODY SHOP MANAGER

*(Title)*



*(Signature of Certifying Official)*

12-9-09

*(Date)*