

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N789657330

FACILITY: PREMIER FINISHES LLC		SRN / ID: N7896
LOCATION: 28060 GROESBECK HWY, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Brian Borowski , Partner		ACTIVITY DATE: 05/14/2021
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced on-site inspections on March 17, and May 14, 2021.		
RESOLVED COMPLAINTS:		

MARCH 17, 2021, ON-SITE INSPECTION

On March 17, 2021, I conducted an unannounced on-site inspection of Premier Finishes, LLC, located at 28060 Groesbeck Highway, Roseville, Michigan. This facility has been assigned the State Registration Number (SRN) of N7896. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; Permit to Install No. 36-18; and Consent Order AQD No. 2019-05.

Premier Finishes, LLC (Premier Finishes) is an automotive and truck repair, finishing, and detailing facility.

CONSENT ORDER AQD No. 2019-05

Per a Teams meeting with Jeff Rathbun, EGLE Senior Environmental Engineer; on March 17, 2021, Premier Finishes is past due on the Consent Order payment schedule. Jeff informed me that Mr. Borowski has not responded to his phone calls, email, and certified letter. Therefore, Jeff Rathbun asked me to convey his request for Mr. Borowski to contact him to resolve settlement issues, otherwise, enforcement will have to escalate collection activities.

Regardless of EGLE's enforcement actions, Mr. Brian Borowski and all of the Premier Finishes employees have been welcoming and friendly during the inspections I have conducted. Per Jeff Rathbun's request, I held a private conversation with Mr. Borowski in which I explained the importance of contacting Jeff Rathbun immediately because payment delay will result in additional costs to Premier Finishes, of which some can be avoided if Mr. Borowski contacts Jeff Rathbun. I gave Mr. Borowski the new telephone number for Jeff Rathbun. Mr. Borowski assured me that he would contact Jeff Rathbun. I emphasized that it was Mr. Borowski's responsibility to contact Jeff Rathbun because (as Mr. Borowski confirmed) Mr. Borowski has not responded to Jeff Rathbun's voicemail messages.

EMISSION UNIT IDs

The emission unit summary table does not indicate which of the two emission units is the double-wide spray booth. I was able to associate each emission unit name with each spray booth by referencing FGBOOTHs, VIII STACK/VENT RESTRICTIONS table. EUBOOTH1 is a single-wide spray booth with a single exhaust stack. EUBOOTH2 is the double-wide spray booth with two exhaust stacks. For on-site reference, EUBOOTH1 is adjacent to the south wall, and EUBOOTH2 is adjacent to the north wall.

BACKGROUND

After my previous inspections on August 7, 2020, on August 25, 2020, a violation notice was issued for noncompliance with recordkeeping requirements, failure to maintain the spray booth exhaust system with a proper pressure drop, and improperly installed particulate control exhaust filters.

MARCH 17, 2021, ON-SITE INSPECTION

I have been receiving spray booth coating use records on a bi-monthly basis. Per my conversation with Mr. Brian Borowski, Owner; and Ms. Brenda Hasseler, Bookkeeper; on March 17, 2021, I informed them that I find the reporting satisfactory. We discussed reducing the frequency of sending me the reports, but Ms. Hasseler and Mr. Borowski stated that they would prefer to continue to email their monthly coating use logs every other month because it has been a successful routine, and both were concerned that changing their routine could disrupt recordkeeping and result in a violation. I agreed to the continuation of the bi-monthly emailing of monthly coating use logs.

I inspected both spray booths. I observed one small gap in the placement of the particulate filter media in the EUBOOTH1 downdraft spray booth, which I discussed with Mr. Borowski. I asked to see the EUBOOTH2 exhaust system in operation but was informed that the west exhaust blower motor had failed, and a replacement motor was scheduled to arrive in a few days. Therefore, I could not observe pressure drop readings and determine if the spray booth exhaust system was operating properly.

I observed an uncovered garbage can in the paint mixing room that contained paint and solvent-soaked materials. I commented on the strong solvent odor in the paint mixing room. I discussed the requirements to control fugitive emissions with Mr. Borowski and described readily available options to achieve compliance. Mr. Borowski indicated that he would purchase the items needed to achieve compliance with fugitive emissions control. I informed Mr. Borowski that I would conduct a follow-up inspection to evaluate EUBOOTH2 maintenance and the paint room fugitive emissions control.

CONCLUSION

It appears that Premier Finishes, LLC is continuing to work towards the completion of cleaning the floor exhaust grates in EUBOOTH2. A compliance determination is pending the completion of this corrective action. Additionally, I was not able to observe the EUBOOTH2 spray booth in operation due to a pending blower motor replacement. Therefore, as of this inspection, the compliance status is pending.

* * *

MAY 14, 2021, ON-SITE INSPECTION

On May 14, 2021, I conducted an unannounced on-site inspection of Premier Finishes, LLC, located at 28060 Groesbeck Highway, Roseville, Michigan. This facility has been assigned the State Registration Number (SRN) of N7896. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; Permit to Install No. 36-18; and Consent Order AQD No. 2019-05.

I entered the facility front office and met with Ms. Brenda Hasseler, Bookkeeper. I was informed that Mr. Borowski was not in and that I should enter the shop and speak with Mr.

Pat Lowery, Foreman. Mr. Lowery was familiar with me per previous inspections. Mr. Lowery was friendly and escorted me during this inspection.

I observed that the EUBOOTH2 west-half floor grates had been cleaned. The east-half floor grates had been removed and temporarily replaced with lightweight grates (see photo) while the original grates were out for cleaning. Mr. Lowery turned on the EUBOOTH2 exhaust system so I could observe the pressure drop values. I observed pressure drops of -0.12 inches of water column for the west half of EUBOOTH2, and -0.10 inches of water column for the east half of EUBOOTH2. The observed pressure drop values were outside the manufacturer's specified pressure drop range of 0.00 to +0.80 inches of water column, per the "paint zone" range on the manufacturer's pressure drop gauges. I observed that the damper actuator on the EUBOOTH2 west exhaust stack was removed and was replaced with two vice grip pliers (see photo). Mr. Lowery attempted to manually adjust the dampers with limited success. It appears Premier Finishes LLC failed to maintain and operate the EUBOOTH2 double-wide spray booth pressure drop across the dry particulate filter control device in a satisfactory manner per R 336.1910 because the exhaust damper control actuator was not replaced, which resulted in a pressure drop outside the manufacturer's indicated operating range. This noncompliance shall be cited in a violation notice.

I observed that each spray booth had not been labeled to identify the emission unit as required per PTI No. 36-18, FGBOOTHs Special Condition III.4. and Consent Order AQD No 219-05, 9.A.1. This noncompliance shall be cited in a violation notice.

I observed an uncovered garbage can in the paint mixing room that contained paint and solvent-soaked materials (see photo). I also observed open cans of solvent and an open cup of solvent (see photos). I commented on the strong solvent odor in the paint mixing room. I discussed the requirements to control fugitive emissions with Mr. Lowery. Mr. Lowery stated that Mr. Borowski had purchased a safety lid, but the purchase of a matching drum was pending. Mr. Lowery escorted me to the front office so I could verify the safety lid had been purchased (see photo). These observed fugitive emission noncompliances appear to be violations of PTI No. 36-18, FGBOOTHs Special Conditions III.1 and III. 3, and Consent Order AQD No 219-05, 9.A.1., which shall be cited in a violation notice.

CONCLUSION

It appears that Premier Finishes in violation of PTI No. 36-18, FGBOOTHs Special Condition III.1, and Consent Order AQD No 219-05, 9.A.1., because the permittee failed to capture all waste materials and store them in closed containers.

It appears that Premier Finishes in violation of PTI No. 36-18, FGBOOTHs Special Condition III. 3, and Consent Order AQD No 219-05, 9.A.1., because the permittee failed to handle all VOC and HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions, and the permittee failed to keep containers covered at all times except when operator access is necessary.

It appears that Premier Finishes in violation of PTI No. 36-18, FGBOOTHs Special Condition III.4, and Consent Order AQD No 219-05, 9.A.1., because the permittee failed to identify and clearly label EUBOOTH1 and EUBOOTH2 according to a method acceptable to the AQD District Supervisor within 30 days of issuance of PTI No. 36.18.

It appears that Premier Finishes is in violation of R 336.1910. The permittee failed to maintain and operate the EUBOOTH2 double-wide spray booth control device in a satisfactory manner because the exhaust damper control actuator was removed and not replaced. It appears that the failure to maintain the damper control actuator resulted in

observed pressure drops of -0.12 and -0.10 inches of water column, which are outside the manufacturer's specified pressure drop range of 0.00 to +0.80 inches of water column.

A violation notice shall be issued citing the aforementioned noncompliances.



Image 1(IMG_0164.JPG): March 17, 2021. East half of double-wide spray booth showing temporary grates while original grates are being cleaned in a burn-off oven at another facility.



Image 2(IMG_0214.JPG) : May 14, 2021, Image of a broken damper actuator on the west plenum of the double-wide spray booth that has been replaced with vice grip pliers. This is one of two actuators on the double-wide spray booth that automatically adjust the pressure drop.



Image 3(IMG_0218.JPG) : May 14, 2021, The paint mixing room with multiple sources of uncontrolled fugitive

emissions.



Image 4(IMG_0219.JPG) : May 14, 2021, uncovered waste can containing paint and solvent contaminated wastes located in the paint mixing room.



Image 5(IMG_0222.JPG) : May 14, 2021, uncovered can of solvent thinner that was one of the sources of fugitive emissions in the paint mixing room.



Image 6(IMG_0223.JPG) : May 14, 2021, image of hinged safety cover for a waste paint and solvent contaminated materials trash can stored in the front office. Installation is pending the purchase of a metal drum.



Image 7(IMG_0221.JPG) : May 14, 2021, open cup of solvent in the paint mixing room.

NAME *Robert Elmarachi*

DATE 6/1/2021

SUPERVISOR *Joyce*