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

P073349822

FACILITY: MILOSCH'S PALACE COLLISION CENTER		**SRN / ID:** P0733
LOCATION: 4800 S LAPEER ROAD, LAKE ORION		**DISTRICT:** Southeast Michigan
CITY: LAKE ORION		**COUNTY:** OAKLAND
CONTACT: Brian Boreo , Manager		**ACTIVITY DATE:** 06/04/2019
STAFF: Adam Bognar	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On June 4, 2019, Michigan Department of Environment, Great Lakes, and Energy – Air Quality Division (EGLE-AQD) Staff, I, Adam Bognar conducted a targeted inspection of Milosch's Palace Collision Center located at 4800 South Lapeer Road, Lake Orion, MI, 48362. 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 Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules; and Permit to Install No. 44-19.

Milosch's Palace Collision Center is a body shop and collision repair center that also does auto glass repair and glass replacement. I arrived at the facility at around 1:45 pm. I met with Brian Boreo, Manager. I identified myself, provided credentials, and stated the purpose of the inspection. Brian gave me a tour of the facility.

Two spray booths are in operation. The booths are used to paint automotive parts/cars using paint guns. The booths are equipped with dry filters located in the floor. The floor filters in all booths were in place and appeared to be in good shape. Downstream from the floor filters, there is an additional dry "pocket style" filter located just before the blower and building exhaust stack. The pocket filters in both booths were in place and in good condition. The floor filters are replaced approximately once per month and the pocket filters are replaced as needed.

There is an additional portable spray area used for small jobs that consists of a plastic enclosure and a fabric filter/blower setup. The plastic enclosure is approximately 5'x5'. The paint jobs are sprayed right in front of the filter so that most of the PM emissions are captured. The filters were in place and in good shape.

Most of the paint is water based with the exception being the clear coat, which is solvent based. Mr. Boreo provided me with paint usage records for 2019 which indicate that the combined paint usage of all booths is less than 200 gallons per month, including water. I collected copies of paint usage records for April and May 2019 (See attached). The paint booths at this facility appear to be exempt from Rule 336.1201 requirements pursuant to Rule 336.1287 (2)(c).

PTE – The coating with the highest HAP content is the clear coat (LC4100), at 25% xylene (highest individual HAP content used at facility) and 60% total HAPs. If 200 gallons of this coating is used in each of the two booths each month, then the total xylene emitted would be approximately 5 tons. Total HAP would be 20 Tons. This is not representative of normal operations. Most of the paint used at this facility is water based. Milosch's Palace Collision Center appears to be a true minor source.

There is a paint storage area in the center of the building. The paint room was relatively clean and the lids on the paint cans were sealed. No strong odors were noted in the paint room. They appear to be storing the paints using good pollution prevention techniques.

A solvent based cold cleaner is present in the paint room used to wash paint guns between uses. The air/vapor interface is approximately 2'x2'. The solvent used, known as "Laquer Thinner", consists of methyl alcohol, toluene, acetone, petroleum distillates, and dimethoxypropane. It is stored in a 55-gallon drum located next to the cold cleaner. The solvent is cleaned and recovered each Monday using a solvent recovery system adjacent to the cold cleaner. I provided Mr. Boreo with a "MDEQ cold cleaner operating procedures" sheet and instructed him to place it near the cold cleaner where it is visible to employees using the cold cleaner. The cold cleaner appears to be exempt from Rule 336.1201 requirements pursuant to Rule 336.1281 (2)(h).

The solvent recovery system filters out the paint solids, distills the hydrocarbons, and produces solid waste that is disposed of as hazardous waste. The clean solvent produced is reused in the cold cleaner. The solvent

recovery system is a closed-loop process. The solvent recovery system appears to be exempt from Rule 201 requirements pursuant to Rule 285(2)(u).

There are two waste oil burning space heaters present in the general storage area of the building. The maximum heat input of each of the space heaters is 300,000 BTU/hr. Two waste oil containing storage tanks are located adjacent to the general storage area. Most of the waste oil used for the space heater is not generated on site. Instead, a majority of waste oil is brought in from other locations. A lesser quantity of waste oil generated at the facility is also used.
These two space heaters are not exempt from Rule 201 requirements pursuant to Rule 285(2)(b)(iv) because the heaters burn waste oil generated offsite. A violation notice was sent to the facility on February 28, 2018 for operating these space heaters without a Permit to Install. The facility obtained Permit to Install No. 44-19 on March 13, 2019 for the two waste-oil burning space heaters.

Mr. Boreo stated that he has not operated the space heaters since receiving the violation notice from the AQD. Because of this, there are no records associated with the space heaters to evaluate. I informed Mr. Boreo that he must comply with the conditions of Permit to Install 44-19 if he wishes to operate the space heaters. The conditions of this permit require, in part, that the facility keep records of the amount and type of fuel burned in the heaters and whether it was generated on-site or off-site. Additionally, there are restrictions on the types of fuel that may be used and a condition that the waste oil be pre-treated to reduce sedimentation in the oil.

Compliance Determination

Observations made during my inspection and record review indicate that Milosch's Palace Collision Center is operating 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); and Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules.

The February 28, 2018 violation notice may be resolved.

NAME Adam Boyer DATE 8/8/2019 SUPERVISOR SK