

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

U23150867930651

FACILITY: Vision Collision		SRN / ID: U231508679
LOCATION: 5607 E. Saginaw Highway, Grand Ledge		DISTRICT: Lansing
CITY: Grand Ledge		COUNTY: EATON
CONTACT: Matt Hicks, Manager		ACTIVITY DATE: 08/04/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated, unannounced compliance inspection. This is the first time LDO has inspected this facility.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author) and Nick Zabrodsky (permits section)  
Personnel Present: Matt Hicks, Manager(grandlegevisioncollision@yahoo.com)

Other relevant personnel: Troy Yensen, General Manager (visioncollisionhr@yahoo.com)

**Purpose:** Conduct an unannounced, self-initiated compliance inspection by determining compliance with Michigan Air Pollution Control Rules.

**Facility Background/Regulatory Overview:** Vision Collision is an auto body shop where M. Hicks said they do autobody repair and finish, which includes sanding, bondo work, body work, painting, framework, refinishing, and washing the cars before and after working on them. M. Hicks said they send all of their sandblasting jobs over to Barish Sandblasting on Airport Road in Lansing.

M. Hicks said they have been in business at this location since December 2013. There are also other Vision Collision facilities located in the state, including several in the Lansing District: Lansing (2), Haslett, and Dewart.

Vision Collision has 2 paint booths which M. Hicks said were installed in the facility 2 months prior to opening the shop for business. M. Hicks said that each of the spray booths are used 4-5 times per week. Their normal operating hours are 9 a.m. – 5 p.m. five days per week.

Vision Collision was potentially subject to 40 CFR 63 (NESHAP), Subpart HHHHHH, because they are an area source of HAPS from a "Motor Vehicle and Mobile Equipment Surface Coating" operation; this regulation is only federally enforceable at this time. However, Vision Collision sent a petition into the EPA Region 5 office on November 22, 2013, certifying that they do not spray coatings that contain the target HAP, as specified in 40 CFR 63.11180, and would therefore exempt them from being subject to the NESHAP Subpart HHHHHH. The EPA sent Vision Collision a letter on December 16, 2013 stating that they agree with the determination made by Vision Collision that they are exempt from this NESHAP at this time. Vision Collision is required to continuously reevaluate if any of their future coatings contain the target HAP. See attached copy of the letter.

**Inspection:** On August 4, 2015 at approximately 9:45 a.m., Nick Zabrodsky and I arrived at Vision Collision for an unannounced, self-initiated compliance inspection. We met with Matt Hicks, Manager, who gave us a tour of the facility.

There are currently 2 paint booths at Vision Collision that M. Hicks said use air spray guns. These would be exempt from a Permit To Install (PTI) per Michigan Air Pollution Control Rule 287(c), which requires that the coating use rate be not more than 200 gallons per month (minus water content), all exhaust systems serving the coating spray equipment have properly installed and operated particulate control, and the monthly coating use records be kept on file for the most recent 2-year period. During the inspection I noted that each booth has fabric filter controls in both the ceiling and in the floor which M. Hicks said are replaced every 3 months. All fabric filters appeared to be installed properly. I saw no emissions coming from the stack during the inspection. Both booths were being utilized during that time.

Troy Yensen, General Manager, provided me with monthly purchase records of all coatings, including catalyst, aerosol spray cans, cleaners, clear coats, primer, reducers, sealers, and toners (base coats). I reviewed Vision Collision's purchase records from December 2014 – July 2015. Assuming a conservative 100% VOC content for each coating purchased (which is an overestimation because M. Hicks explained that all paint is waterborne), and assuming that all coating purchased in that month was used (which is not typically the case, according to M. Hicks), the highest number of gallons used was 106 in April 2015. The use of aerosol spray cans is exempt per Rule 287(b).

Vision Collision is currently in compliance with the conditions of Rule 287(c) and thus the paint booths are exempt per Rule 287 (c).

**Compliance Statement:** At this time Vision Collision is in compliance with all state and federal regulations.

NAME Michelle Luplow DATE 9-29-15 SUPERVISOR D. M.