

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

FY 2016 Insp-

U6311006433465

FACILITY: Art Moran Buick GMC, Inc.	SRN / ID: U63110064
LOCATION: 29300 Telegraph Road, Southfield	DISTRICT: Southeast Michigan
CITY: Southfield	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 01/14/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2016 inspection of Art Moran Buick-GMC-Mitsubishi, Inc.	SOURCE CLASS:
RESOLVED COMPLAINTS:	

U 63 11 0064 - SAR - 2016 01 14

**Art Moran Buick-GMC-Mitsubishi, Inc. (U-63-11-0064)**  
29300 Telegraph Road  
Southfield, Michigan 48034-1341.

**Art Moran Pontiac Buick GMC, Inc. (U-63-11-0064) → Art Moran Buick-GMC-Mitsubishi, Inc. (U-63-11-0064).** About 2010, Art Moran moved from 21375 Telegraph Road (Body-shop), Southfield (N3928) to 29300 Telegraph Road (U-63-11-0064) in order to consolidate both body shop and service shop.

PTI voided: Permit-to-Install Nos. 1107-92 dated October 4, 1993 and 1108-92 dated October 18, 1993 (N3928) for paint spray booths; the permits were obtained as a result of Violation Notice (Dec 21, 1992). About 2010, Art Moran removed three (3) booths and other process equipment and moved them to 29300 Telegraph Road (U-63-11-0064), Southfield, from 21375 Telegraph (N3928), Southfield, in order to consolidate its operations in one locagtion. Only two booths were installed at new location. The booths are now exempt from Rule 336.1201 (PTI) pursuant to Rule 287(c). Both permits (1107-92 & 1108-92) were voided on February 23, 2011

**Not subject to: NESHAP / MACT T for Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; Federal Register / Vol. 59, No. 231 / Friday, December 2, 1994). No halogenated solvent.**

**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 **Art Moran's** compliance with NESHAP / MACT 6H.

On January 14, 2016, I conducted a level-2 self-initiated inspection of Art Moran Buick-GMC-Mitsubishi, Inc. ("Art Moran") located at 29300 Telegraph Road, Southfield, Michigan 48034-1341. 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; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the FY 2016 inspection, Mr. Mr. Felix Quintanilla (Phone: 248-355-7640; Fax: 248-353-9000; E-mail: fQuintanilla@ArtMoran.com), Body-shop Manager, assisted me.

Mr. Ron Broadwater (Phone: 248-355-7683; Fax: 248-355-7619; E-mail: rBroadwater@ArtMoran.com), Service Manager, separated about 2012 .Mr. Gary Gorkiewicz (Ph: 248-354-5110; Fax: 248-354-2413; E-mail: garyg@artmoran.com), Body Shop Manager, also separated about 2012.

Mr. Eric Pluff (Ph: 248-354-5110; E-mail: ePluff@ArtMoran.com), Body Shop Manager at 21375, separated just before the move / consolidation.

**N3928:** Art Moran Pontiac Buick GMC, Inc. (as it was previously known as), 21375 Telegraph Road (Body-shop), Southfield, Michigan 48033-4216. Art Moran vacated the building and leased it to Southfield Collision Center, Inc. (N3928). Art Moran removed three of three booths and other process equipment and moved them to

29300 Telegraph Road (U-63-11-0064) in order to consolidate its operations (only two of three booths were installed at new location).

Art Moran's body shop and service shop, before the move, were separated by about 4 miles. Obviously, while body shop had paint spray booths, service shop had the cold-cleaners. Upon removing the booths (3) and other process equipment, Art Moran leased the building to Southfield Collision; only two booths were installed at new location.

Art Moran Body Shop is an automotive body shop specializing in GM cars and trucks and Mitsubishi cars. Of Art's three identical paint spray booths (15 ft. W \* 24 ft. D \* 12 ft. H) at 21375 Telegraph, two are moved and installed at 29300 Telegraph; one booth is permanently removed. Two (2) of three (3) booths at 21375 had AQD permits as a result of December 21, 1992, letter of violation.

At this time (FY 2016) two identical downdraft booths (15 ft. W \* 24 ft. D \* 12 ft. H) are present at 29300 Telegraph. All booths are equipped with downdraft filters, which were installed and operating properly during the inspection, for paint overspray particulate, and intake air filters at the top for paint finish quality. The filters are replaced about once per month. I stated that the filters may be replaced based upon pressure differential ( $\Delta P$ ) across the filters. Being a collision shop, paint usage per month is less than 100 gallons per month. In addition, these days all basecoat coatings are water based.

The cars are dried at 160 °F. I asked Mr. Quintanilla to install the 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. The paint and solvent usage records were not available. Being a collision shop, the paint usage is much less than 200 gallons per month.

All booths are now exempt from Rule 336.1201 pursuant to Rule 336.1287(c). Since the booths (2 of 3) are now exempt and the booths are moved to new location, PTI Nos. 1107-92 and 1108-92 were voided on February 23, 2011.

#### **Nitrogen paint spray booth - removed**

Top-Spray Destatic Nitrogen ([www.eurosider.com](http://www.eurosider.com)) paint spray equipment is removed as all basecoats are now water based (about 2014). Nitrogen instead of air was used to atomize paint. The paint is heated to reduce viscosity and negatively charged to increase transfer efficiency. Negatively charged paint particles were applied to grounded car body. This increase in transfer efficiency was saving about 30 percent of paint. The body shop spent about \$12,000.00 per month for paint. Nitrogen booth was removed because all basecoats (BC) now are water based.

#### **Paint thinner reclaimer**

The body shop had one paint thinner reclaimer, which was also moved to this location. Becca USA, Inc. makes this equipment. Solvent and paint wastes were placed in 5-gallon drum and heated to evaporate volatiles. Vapors of volatile organic compounds (VOC) were condensed using a heat exchanger (like a car radiator) and collected in a drum. The collected solvents were reused. Art Moran paid \$13,000.00 for this evaporator-condenser equipment and the economic payback period was 14 months.

As all basecoat (BC) paints are now water based, this equipment is removed. Clearcoat (CC) paints continue to be solvent based. One water based paint guns cleaner (Becca USA, Inc.) is present.

#### **RCRA inspection (Jim Day)**

Mr. Jim Day of MDEQ-HMWD conducted Resource Conservation and Recovery Act (RCRA) inspection to determine if dried waste paint material is a RCRA waste. Mr. Day sent the Apr 30, 2008, letter of warning to Art Moran (Site ID Nos.: MID 065573511 for 29300 Telegraph and MID 985568245 for 21375 Telegraph)

#### **Service Shop Parts Cleaners**

There are three (3, one of four, that existed about 2011, removed) parts cleaners or cold-cleaners or degreasers at the service shop. They are serviced by Vesco Oil Corporation (Phone: 248-557-1600). No halogenated solvent is used. Only petroleum distillates with relatively low vapor pressure are used. Therefore, as halogenated solvents are not used, the cold cleaners are not subject to NESHAP for Halogenated Solvent

Cleaning (40 CFR, Part 63, Subpart T; Federal Register / Vol. 59, No. 231 / Friday, December 2, 1994).

A 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.

I found, for three of three cleaners, lid open when not in use; I asked Mr. Quintanilla to ensure that the cold-cleaners are kept closed at all times when idled. I gave (FY 2016) to Mr. Quintanilla additional copies of DEQ's "cold-cleaner operating procedures". Previously given work-practice decals were poster per Rule 707.

The lids are mechanically assisted. The parts cleaners are "sink on a drum" type. Drums with dirty solvent are removed with drums with clean solvent by VESCO once per month. VESCO services these parts cleaners.

VESCO solvent: VIC-SOL Mineral Spirits (reclaimed) – Petroleum Naphtha. Combustible Liquid UN 1255. Specific Gravity (SG) = 0.79 at 60 °F. Vapor Pressure (VP) = 10 mm Hg at 100 °F. Boiling Point (BP) = 315 °F. Flash Point (FP) = 108 °F TCC Method. Flammability Range = 0.9 %v (LEL) - 7 %v (UEL).

**Conclusion**

Being a collision shop, paint usage per month is less than 200 gallons per month. Follow-up inspection is necessary for cold-cleaners. PTI Nos. 1107-92 and 1108-92 were voided on Feb 23, 2011.

NAME *J. W. Hennahall* DATE *02/24/2016* SUPERVISOR *CJE*