

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

U-63-14-11066

U63141106635160

FACILITY: PPG Business Development Center		SRN / ID: U631411066
LOCATION: 28066 Oakland Oaks Court, Wixom		DISTRICT: Southeast Michigan
CITY: Wixom		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 06/10/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2016 annual inspection of PPG Business Development Center		
RESOLVED COMPLAINTS:		

U6314 11066 - SAR - 2016 06 10

**PPG Business Development Center (U-63-14-11066)**  
**28066 Oakland Oaks Court**  
**Wixom, Michigan 48393-3348**

On June 10, 2016, I conducted a level-2 self-initiated annual inspection of PPG Business Development Center ("the company" or "PPG") located at 28066 Oakland Oaks Court, Wixom, Michigan 48393-3348. 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 Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

During the inspection, Mr. Brian A. Oakley (Phone: 248-974-3235; Cell: NA; Fax: 248-347-3350; E-mail: bOakley@ppg.com), Senior Region Sales Manager, assisted me.

During the inspection, Mr. Jeff Matauch (Phone: 248-347-3350; Cell: 313-590-2721; Fax: 248-347-1069; E-mail: jMatauch@PPGfinishes.com), Technical Sales Instructor Supervisor, was not present.

This is a collision shop business development center for after-market automotive coatings (collision shops). It also provides collision shop painting training. A classroom is present. There are total of five stacks. PPG can use this facility to train customers for NEASHAP / MACT 6H. According to Mr. Brian A. Oakley, there are about 1500 collision shops in Michigan. PPG has 55% market share in a collision repair painting business.

**Prep deck**

One prep deck with downdraft filter is present. Auto body part sanding is done at the deck. The exhaust gases upon filtration are discharged to in-plant environment.

The deck is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

**Spray areas (2)**

Two spray areas with back-draft filters are present.

**Downdraft spray booth**

One collision shop (size and type) booth equipped with down-draft dry filters is present. Intake air filter system is also present for finish quality. The booth is equipped with Magneheilig pressure drop ( $\Delta P$ ) gauge, which was not adjusted properly for Zero when booth was not operating during the inspection.

Like almost all collision shops, substantially less than 200 gallons per month (about 10 gallons per month at Wixom) of primer, basecoat (BC), clearcoat (CC) coatings are used. While basecoat (BC) coatings may either be solvent-based or water-based, clearcoat (CC) coatings are always solvent-based. Furthermore, primer surfacer is always solvent based. The booth is primarily used for training PPG customers from automobile collision repair industry. I asked Mr. Oakley to train PPG's customers with regards to NESHAP / MACT 6H; MDEQ website (Clean Air Assitance) has useful information.

I asked Mr. Oakley to install and inspect 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 according to Rule 336.287(c).

The booths are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c).

### Paint kitchen

In the paint kitchen paints and solvents are stored. Bond-and-ground technique is used to prevent fire and explosion. In the paint kitchen, one aqueous and two (one of two peddle-operated) solvent cold-cleaners (parts-cleaners) are present.

### BECCA cleaner

Water based detergent cleaner. The water is filtered and recycled / reused.

### 2 ft. \* 1 ft. cold-cleaner

One 2 ft. \* 1 ft. cold-cleaner is present. It is solvent tank type. The cold-cleaners are 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.

The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

On September 3, 2014, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice in the procedures.

PPG proprietary solvent is used. Acrylic lacquer thinner (PPG 1-800-647-6050).

100% VOC solvent. Flash Point (FP) = 10 °F CC. Auto Ignition = NA °F. Boiling Point (BP) = 100 °F @ 760 mm Hg. Vapor Pressure (VP) = 134 mm Hg or 17.9 kPa at 68 °F. Specific Gravity (SG, Water = 1.0) = 0.8. Density (ρ) @ 68 °F = 6.68 lbs. / gallon. Flammability range = 2 %v (LEL) – 6%v (UEL).

Based upon flash point and boiling point, this is highly volatile solvent. Hence, there is higher probability of fire and explosion.

### Peddle-operated cold-cleaner 2.5 ft. \* 2 ft.

One peddle-operated cold-cleaner (2.5 ft. \* 2 ft.) is present is present as well. The lid is peddle-operated and hence it is practically always closed when an operator is not present to press the peddle that mechanically operates the lid. The cold-cleaner consists of two compartments inside: one compartment for cleaning when parts (such as guns) are dirty and the other compartment for final finishing cleaning of parts previously cleaned on dirty side.

All other things are same as the above parts-cleaner.

All process equipment at Wixom are used for training purposes. A well-equipped classroom is also present. This facility is an ideal training center for NESHAP / MACT 6H training.

### Conclusion:

All paint spray booths and sanding booths are exempt from Rule 336.1201 (Permit-to-Install). The booths are used for training purposes. Exhaust gases discharged via five stacks.

NAME

J. J. Kananahalli

DATE

06/24/2016

SUPERVISOR

CJE