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

FY 2015 Insp-

U63141558027937

FACILITY: Ferndale Collision Auto Repair		**SRN / ID:** U631415580
LOCATION: 180 Vester St.		**DISTRICT:** Southeast Michigan
CITY: Ferndale		**COUNTY:** OAKLAND
CONTACT:		**ACTIVITY DATE:** 11/25/2014
STAFF: Iranna Konanahalli	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:**
SUBJECT: FY 2015 inspection of Ferndale Collision Auto Repair		
RESOLVED COMPLAINTS:		

E-file: U-63-14-15580-SAR_2014 11 25

Ferndale Collision Auto Repair (U-63-14-15580)
180 Vester St.
Ferndale, Michigan 48220-1712

Phone: 248-545-1920
Web: FerndaleCollision.com

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 Ferndale Collison's compliance with NESHAP / MACT 6H.

Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations

On November 25, 2015, I conducted a level-2 self-initiated inspection of Ferndale Collision Auto Repair ("Ferndale Collision") located at 180 Vester St., Ferndale, Michigan 48220. 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) administrative rules.

During the inspection, Mr. Dennis Zoma (Phone: 248-545-1920; Fax: 248-545-8797; E-mail: dennis@FerndaleCollision.com), Manager, assisted me.

A paint spray booth with dry filters

One collision shop paint spray booth (30 ft. Depth * 15 ft. Wide) with downdraft dry filters is present. About 10-15 gallons of paints per month are used based upon estimates although the usage record is not kept. Water based basecoat (BC) and solvent based clearcoat (CC) paints are used. The booth is heated 150 °F for rapid drying. Inclined manometer pressure drop (ΔP) monitor is present to assist in a decision to change filters. 2 gallons primer, 10 gallons of BC and 3 gallons of CC paints per month are used. Clearcoat (CC) paints are solvent based. The booth's roof intake (make-up) air filters are present to enhance product quality.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c).

Also, I gave Mr. Zoma NESHAP / MACT 6H information and referred to him DEQ's website for MACT 6H information and compliance. I asked him to deal directly with US EPA, Chicago.

Cold-cleaner

There is one 3'x2' parts-cleaner / cold-cleaner with spray a brush and a solvent tank. 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 unit may be described as a "sink on a drum". The solvent is stored in the drum (enclosure reservoir) of about 25 gallons capacity. Parts are placed in the sink area and solvent is pumped over the part. The solvent then drains back into the drum. Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner.

Vesco Oil (800-356-3560) supplies the solvents and services the cold-cleaners. Mineral spirits containing no halogenated solvents is used. Periodically, dirty solvent is picked up for disposal or recovery.

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

Mechanically assisted lid was open during the FY 2015 inspection. Besides, the operating procedures were not posted.

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.

VIC-SOL Mineral Spirits (Stoddard solvent) or aliphatic hydrocarbons

100% VOC petroleum hydrocarbon solvent. Flash Point (FP) = 108 °F TCC. Auto Ignition = 490 °F. Boiling Point (BP) = 315 – 392 °F @ 760 mm Hg. Vapor Pressure (VP) = 10 mm Hg at 100 °F. Specific Gravity (SG, Water = 1.0) = 0.79. Density (ρ) @ 68 °F = 6.59 lbs / gallon (0.790 kg /L). Flammability range = 0.9 %v (LEL) – 7%v (UEL). Viscosity = 1 centistokes (CST) @ 77 °F

Herkules parts cleaner

One 2 ft. * 3 ft. water-based cleaning system is present. Paint guns are cleaned.

Conclusion

Ferndale Collision is in compliance with Rules 281, 285, 287. Ferndale Collision must deal directly with US EPA concerning NESHAP / MACT 6H.

NAME J Steenmahall DATE 12/08/2014 SUPERVISOR CTE