

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

N1469
 FY2018 Insp-

N146942578

FACILITY: Town and Country Autobody, Inc		SRN / ID: N1469
LOCATION: 3225 East Oakley Rd, COMMERCE TWP		DISTRICT: Southeast Michigan
CITY: COMMERCE TWP		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 10/11/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2018 inspection of Town and Country Autobody, Inc. ("Town and Country")		
RESOLVED COMPLAINTS:		

Town and Country Autobody, Inc. (N1469)
 3225 East Oakley Park Road
 Plant: Walled Lake
 P.O. Commerce Twp., Michigan 48390-1649

Phone: 248-668-3007
 Fax: 248-668-3054
 E-mail: TandCAutobody@yahoo.com

N4123 is an incorrect SRN for this location. PTI No. 736-86 (N4123) (issued: 12/04/1986 and voided: 03/01/2007) is issued to ALLOR BROTHERS COLLISION, 6000 TIREMAN STREET, DETROIT (N4123)

PTI void: Permit-to-Install No. 653-82 (N1469: approved on January 4, 193 and voided on March 01, 2007).

SRN reassign: Allor Bros Collision, Inc. (went out of business about 2007) → Town and Country Autobody, Inc., which started operation about 2008.

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 not taken delegation of these Area Source MACT standards and therefore no attempt has been made evaluate Town and Country's compliance with NESHAP / MACT 6H. Mr. Allor stated that a paint booth services company is helping Town and Country to comply with the federal regulations. In addition, I printed a copy of "Michigan Autobody Environmental Compliance Workbook" for Mr. Allor.

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. MACT T Chlorinated HAPs are not used.

On October 11, 2017, I conducted a level-2 self-initiated **FY 2018 inspection** of Town and Country Autobody, Inc. ("Town and Country") located at 3225 East Oakley Park Road, P.O. Commerce Twp., Michigan 48390-1649, Plant: Walled Lake. 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. Neil Allor (Phone: 248-668-3007; Fax: 248-668-3054; E-mail: TandCAutobody@yahoo.com), Owner, assisted me. Mr. Roy Russel, Manager and Tech, separated about December 2014.

Allor Bros Collision, Inc. (N1469; N4123 is an incorrect SRN for this location), which was owned by Mr. John Allor, went out of business few years ago (about 2007). Mr. Neil Allor, a relative (cousin) of John Allor, started new collision shop known as Town and Country Autobody, Inc. at the same site in Commerce Township. AQD (Geffrey Richardson) issued, on November 25, 1981, PTI No. 801-80 (M3794) to A & M Collision (Patrick Allor) located at 24792 Crestview Ct., Farmington Hills. Patrick Allor is Neil Allor's uncle and father of John Allor. Pat Allor moved his collision repair business several times (24792 Crestview Ct., Farmington Hills (M3794), to 24792 Hathaway, Farmington Hills (M3794 → P0830) to current location 3225 East Oakley Park Road, Walled Lake (N1469). Tommy Mason bought the collision business at Walled Lake from John Allor, son of Pat Allor. Pat Allor continues to own the Walled Lake (P.O.: Commerce Township) building. Neil Allor leases the building from Pat Allor. Hydroblast (M3794 → P0830) stores equipment at 24792 Hathaway, Farmington Hills. At 24792 Crestview Ct., Mail-Tek, Inc. (M3794) assembles US Postal Service equipment.

A Rule 336.287 paint spray booth with dry filters

One collision shop paint spray booth (15 ft. W * 20 ft. D * 10 ft. H), with back-draft dry filters (at two back corners), is present. The paint over-spray filters (9 filter panels at each corner; total 18 filter panels) are located at two corners at the back. Intake air is filtered at front door to obtain high quality finish. Intake air filters enhance finish quality. About <10 gallons of paints / coatings per month are used based upon estimates using the usage and mix records kept on the computer. In addition, purchase records are available on the web site as all paints and solvents are purchased from PPG. The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(2)(c).

Town and Country's Mix records on the computer show: date of mix, cost (about \$64.00 per pint), VOC (pounds per gallon), HAPs (pounds per gallon), usage (fluid ounces per mix), manufacturer of vehicle (e.g. GM), OEM code, brand code, etc.

Mr. Allor stated that he has been planning to get a superior downdraft booth.

During FY 2011 inspection, I found gaps and holes in the filter system. During FY 2011 inspection, I asked Mr. Allor to caulk or tape (painters tape or duct tape) the gaps due to structural defects in the filter system such that particulate laden exhaust air due to paint overspray does not leak through the gaps. I asked Mr. Allor to install the corner 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 FY 2011 follow-up inspection, showed proper installation of the filters.

Approximately 5 gallons of solvents per year (annual) are used for clean-up (guns, tools, etc.). Town and Country uses solvent based clearcoat (CC) and basecoat (BC) coatings. Unlike most car / truck dealerships or collision shops, water based BC coatings are not used yet. Only solvent-based coatings are used. Solvent-based coatings provide better finish and durability.

The stack is equipped with a no-pressure loss ($\Delta P = 0$ Pascal) rain protection sleeve such that odor-bearing air contaminants are discharged vertically upwards. The stack is about 30 ft. tall from the ground level.

Also, during FY 2011 inspection, I gave Mr. Allor 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. I could not play DEQ and EPA videos due to problems with the computer's player. I printed out for Mr. Allor DEQ's MACT 6 H fact-sheet showed him notification forms (Initial, Final Compliance). The booth is an existing NESHAP / MACT 6H paint shop. During FY 2018 inspection, I printed a copy of "**Michigan Autobody Environmental Compliance Workbook**" for Mr. Allor.

I asked Mr. Allor to seek NESHAP / MACT 6H help from PPG's Training Center of Wixom, Michigan. PPG is a main paint supplier for collision shops in Michigan. PPG has 55% market share in a collision repair painting business in Michigan. There are about 1,500 collision shops in Michigan.

Parts / cold cleaner

One Herkules Gun Cleaner (3 ft. * 3 ft.) parts / cold cleaner is present. The unit may be described as a "sink on a tank". Its lid was closed during the inspection.

Each cold-cleaner is subject rule 336.611 or 336.1707 (new) depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(2)(h) or Rule 285 (2)(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.

It is equipped with a safety interlock that the solvent would not spray when the lid is open. The lid is mechanically assisted. The lid was closed during the FY 2018 inspection. The operating procedures as required by the Rule 707 were posted.

On February 6, 2015, 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.

Lacquer solvent that contains no halogenated solvent is used. The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

Finish Pro General-Purpose Lacquer Thinner 707692 is used. The solvent is manufactured by Cumberland Products Inc. (800-434-9300) of Hodgenville, KY. The lacquer thinner contains:

1. Methanol (CAS 67-56-1): 40-50%
2. Toluene (CAS 108-88-3): 30-40%

3. Acetone (CAS 67-64-1): 15-20%
4. Petroleum naphtha (CAS 64742-89-8): 10-15%

85% VOC solvent (acetone is not VOC). Flash Point (FP) = 20 °C Tag Closed Cup (TCC). Auto Ignition = NA °F. Boiling Point (BP) = NA °F @ 760 mm Hg. Vapor Pressure (VP) = 85.8 mm Hg at 20 °C. Specific Gravity (SG, Water = 1.0) = 0.8. Density (ρ) @ 68 °F = 6.7 lbs. / gallon (0.808 kg /L). Flammability range = NA %v (LEL) – NA %v (UEL).

Based upon low flash point (20 °C = 68 °F) Tag Closed Cup and high vapor pressure (85.8 mm Hg at 20 °C), this lacquer is highly dangerous solvent regarding fire, explosion, safety, etc. hazards. Hence, the solvent is highly volatile and it would quickly evaporate if the mechanically assisted lid is not firmly closed.

While methanol is highly toxic, acetone is highly flammable.

Solvent still

Solvent still to recover (evaporate solvents from dirty waste solvents and condense) clean recyclable solvent is not used anymore. The still is not rented anymore from DHI Spray Booth (248-476-7815) of Novi. Waste Solvents and paints are disposed as RCRA hazardous waste using New Millennium of Clarkston as a service provider.

Conclusion

Town and Country is in compliance with Rule 287(2)(c). The collision shop uses highly volatile and explosive solvent in the degreaser.

Allor Brothers Collision (N4123), 6000 Tireman Street, Detroit

Allor Bros Collision, Inc. (N1469), 3225 East Oakley Park Road, Plant: Walled Lake, P.O. Commerce Twp, Michigan: went out of business about 2007

NAME *J. S. McManahall* DATE *12/6/2017* SUPERVISOR *John A.*