DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection

FACILITY: Lunghamer Buick GMC. Inc		SRN / ID: N3682
LOCATION: 5825 HIGHLAND, WATERFORD		DISTRICT: Southeast Michigan
CITY: WATERFORD		COUNTY: OAKLAND
CONTACT: Tony Tinnin , Body Shop Manager		ACTIVITY DATE: 01/09/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: Unannounced Lev	el 2 Target Inspection.	
RESOLVED COMPLAINTS:		

On 1/09/2015, I conducted a level 2 unannounced target inspection at Lunghamer Buick -GMC, Inc. located at 5825 Highland Road, Waterford, MI 48327. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules, and the facility's Permit to Install No. 254-92. During the pre-inspection meeting, I initially showed my credential (ID Badge), stated the purpose of my visit, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities", to Mr. Tinnin, Body Shop Manager, and Mr. Dave Snelling, facility Executive Manager.

The facility is a General Motors auto dealership and operates a vehicle body shop primarily for automobile body repairs and repainting. PTI No. 254-92 was issued originally to AI Dittrich Oldsmobile, GMC Truck, Inc. for a spraybooth filter coating system. I did not find documentation in the file that the new company, Lunghamer Buick - GMC, Inc. accepted/requested transfer of PTI No. 254-92 to the new company after it purchased the old company. AQD records indicated that the facility was classified as a AQD Rule 208a subject facility due to the facility's potential to emit for Hazardous Air Pollutant exceeding 10 tons per year resulting from operating 2 spraybooths with only one spraybooth permitted and the other spraybooth exempt from permit to install requirements per AQD Rule 287(c).

During the inspection, I observed only one spraybooth operating. Per Mr. Tinnin, the other spraybooth (1) is being utilized as prep room. I observed filters in place with no gaps in between filters. I discussed with Mr. Tinnin and Mr. Snelling that AQD Rule 208a is being rescinded and the facility has options of keeping the 2 spraybooths and applying for a HAPs Optout permit; or accept and convert PTI No. 254-92 into a HAPs Optout permit by accepting federally enforceable restrictions as applicable requirements added to the permit; or uninstall/disable the second spraybooth and either accept/keep PTI No. 254-92; or uninstall/disable the first spraybooth, request to void PTI No. 254-92, and operate under AQD Rule 287(c) permit to install exemption by complying with the exemption applicable requirements.

On 2/10/2015, I received the facility's coating use records. Mr. Tinnin submitted records from coating supplier showing coating use rates for FY2014 at 648 gallons per year and 2,044 lb./year (1.02 tpy). This was less than the permit limit of 5.0 tpy in PTI No. 254-92. The highest monthly coating usage was reported in October 2014 at 75 gallons and way less than the 200 gallons/month requirement in AQD Rule 287(c) permit to install exemption limit. At a conservative minimum of 20 operating days per month, 8 hours per day, and 7.56 lb./gal. highest coating VOC content, the average hourly VOC emission rate is at 3.54 lb./hour and less than the 7.5 lb./hr. permit limit in PTI No. 254-92.

Overall, I did not find any noncompliance issues during the inspection. I will conduct a followup on the facility's action plan to address the Rule 208a issue but currently appears to be a operating as a minor source.

NAME

DATE 2015 SUPERVISOR