

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

FY2016

N378933374

FACILITY: JOSEPH LUNGHAMER CHEVROLET INC		SRN / ID: N3789
LOCATION: 475 SUMMIT DR, WATERFORD		DISTRICT: Southeast Michigan
CITY: WATERFORD		COUNTY: OAKLAND
CONTACT: Lee Mabe, Bodyshop manager		ACTIVITY DATE: 02/12/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2016 SM CMS inspection of Joe Lunghamer Chevrolet		
RESOLVED COMPLAINTS:		

N3789-SAR-2016 0212

Joe Lunghamer Chevrolet (N3789)
 475 Summit Drive
 Waterford, Michigan 48328-3368.

PTI: ROP and MACT Synthetic Minor PTI No.26-92A

PTI revision: PTI No.26-92A (VOC limit: 28 tons per year) dated May 9, 1993 (void: 08/31/1993) → PTI No.26-92A (EU-COATING, I.1 limit: 2,000 pounds of VOC per month and FG-FACILITY, I.1 limit: 8.9 tons of VOC per year) dated August 31, 2015. The revision is result of July 2015 AQD (Zhu) inspection.

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. Parts/cold-cleaner (s) may be present in Service Shop, which I did not inspect.

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 / MACT 6H 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 Joe Lunghamer Chevrolet's compliance with NESHAP / MACT 6H.

On February 12, 2016, I conducted a **SM CMS level-2 self-initiated** inspection of Joe Lunghamer Chevrolet ("Chevrolet") located at 475 Summit Drive, Waterford, Michigan 48328-3368. 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. Lee Mabe (Phone: 248-683-7100 or 248-292-2470; Fax: 248-683-6479; E-mail: NA), Body-shop Manager, assisted me.

At this time (FY 2016) two identical downdraft booths (15 ft. W * 24 ft. D * 12 ft. H) are present. All booths (AccuDraft, Inc. 800-215-5222) 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 (ΔP) across the filters. Each booth is equipped with Photohelic ΔP gauge.

Being a collision shop, paint usage per month is less than 200 gallons per month. In addition, these days all basecoat (BC) coatings are water based.

The cars are dried at 150 °F. I asked Mr. Mabe to install the filters such that they fit, at all times, snugly without gaps and holes. 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) provided they meet all the conditions of exemption.

Chevrolet revised its permit to ROP & MACT synthetic permit as a result of July 6, 2015, AQD (Zhu) inspection: PTI No.26-92A (VOC limit: 28 tons per year) → PTI No.26-92A (EU-COATING, I.1 limit: 2,000 pounds of VOC per month and FG-FACILITY, I.1 limit: 8.9 tons of VOC per year) dated August 31, 2015.

According to coating and solvent usage records (BASF) 256.6 pounds of VOC emitted per six months (Jul-Dec 2015); equivalent to about 500 pounds of VOC per year (PTI No.26-92A, EU-COATING, I.1 limit: 2,000 pounds of VOC per month and FG-FACILITY, I.1 limit: 8.9 tons of VOC per year). Based upon Jul-Dec 2015 coating usage records, 30-50 pounds of VOC per month are emitted.

While all basecoat (BC) coatings are water based, all clearcoat (CC) coatings are solvent based.

Chevrolet revised the permit to obtain synthetic minor conditions (federally and practically enforceable) based upon the July 06, 2015, AQD (Zhu) inspection and regulatory analysis.

Conclusion

Being a collision shop, paint usage per month is less than 200 gallons per month. However, Chevrolet obtained MACT and ROP Synthetic Minor PTI No.26-92A.

NAME: Blayne Hall DATE: 02/16/2016 SUPERVISOR: CJE