

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

~~N 3885~~ Mainline
FY 2019 Sched Insp
Monicatti

N388546873

FACILITY: MONICATTI CHRYSLER-PLYMOUTH		SRN / ID: N3885
LOCATION: 40755 VAN DYKE, STERLING HTS		DISTRICT: Southeast Michigan
CITY: STERLING HTS		COUNTY: MACOMB
CONTACT:		ACTIVITY DATE: 10/22/2018
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2019 scheduled inspection of Monicatti Chrysler-Plymouth ("Monicatti") and current occupant Vyletel Buick GMC ("Vyletel")		
RESOLVED COMPLAINTS:		

N 3885

Monicatti Chrysler-Plymouth (N3885)
Vyletel Buick GMC (N3885)

40755 Van Dyke
Sterling Heights, Michigan 48313

Phone: 586-977-2800
Fax: 586-977-2800
WWW: VYLETTEL.COM

SRN reassign (October 2018): Monicatti Chrysler-Plymouth (N3885) → Vyletel Buick GMC (N3885). About 2010, Vyletel Buick GMC Volkswagen purchased the building.

PTIs to be voided: Permit-to-Install (PTI) Nos. 558-93 dated October 15, 1993, for two paint spray booths and 520-93 dated July 20, 1993, for Waste Oil Burner. Waste Oil Burner still exists but disabled and not used anymore (since 2010). About 2010, Vyletel Buick GMC Volkswagen purchased the building.

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 no delegation of these standards and therefore no attempt has been made to evaluate Vyletel'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. Vyletel does not use halogenated solvents; only Stoddard solvent.

On October 22, 2018, I conducted a level-2 FY 2019 scheduled inspection of Monicatti Chrysler-Plymouth ("Monicatti") and current occupant Vyletel Buick GMC ("Vyletel"). located

at 40755 Van Dyke, Sterling Heights, Michigan 48313. 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 Natural Resources and Environment, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Kevin DeSantis (Phone: 586-977-2800 or 586-276-4660-Direct; Fax: 586-977-3982; E-mail: Kevin@Vyletel.com), Body Shop Manager, Mr. Don Pinneo (Phone: 586-977-2800 or 586-276-4693-Direct; Fax: 586-977-2681; E-mail: Don@Vyletel.com), Fixed Operations Director, assisted me.

About 2010, Vyletel Buick GMC Volkswagen purchased the building from Monicatti. At Sterling Heights (southwest corner of 18 Mile and Van Dyke Roads), Vyletel operates a collision shop consisting of two enclosed paint spray booths (PTI No. 558-93): Binks (not heated, cross flow filters) and De Vilbiss Concept (heated, downdraft filters). Near the collision shop, during the inspection, I noticed faint paint odor. I confirmed that a freshly painted car was drying (low bake << 194 °F) its paint in heated De Vilbiss booth.

Paint spray booths (2)

An enclosed paint spray booth (De Vilbiss Concept: 20 ft. D * 14 ft. W * 10 ft. H) is equipped with a downdraft filter system. Air flow direction is downdraft. Air-intake filters are also present for higher finish quality. De Vilbiss booth is heated. For small parts and prep, one additional Binks (20 ft. D * 14 ft. W * 10 ft. H) booth is present. Binks is not heated. Unlike De Vilbiss, Binks is equipped with cross-flow filter system. Like Vilbiss, Binks is equipped with intake air filter system. While Binks is equipped with Dwyer inclined manometer (pressure differential reading during the inspection: 0.05 inches of water), DeVilbiss is equipped with Magneheilig pressure drop gauge. Pressure differential readings across the filters guide filter replacement.

I asked Mr. DeSantis 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(2)(c).

The both downdraft (Vilbiss) and cross-flow (Binks) filters were in good condition during the FY 2019 inspection. Total paint usage, based upon purchase records estimates, in two booths together is about 25 gallons of basecoat (BC) and 15 gallons of clearcoat (CC) per month (<< 200 gallons per month).

The booths are covered by PTI No. 558-98 and Rule 336.287(2)(c), which now exempts the booths from Rule 336.1201 (Permit-to-Install) as paint usage is significantly less than 200 gallons per month.

NESHAP / MACT 6H: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

About October 2018, I showed Mr. DeSantis DEQ training and assistance materials on the website:

https://www.michigan.gov/documents/deq/dnre-oppca-faq-Subpart_6H_310934_7.pdf

Parts Cleaner

There is one (1) parts-cleaner or cold-cleaner or degreaser (Vesco Oil Corporation, Southfield. 1-800-356-3560 or 1-248-577-1600) at the service shop. It is "sink-on-a-drum" type (30-gallon drum). No halogenated solvent is used. Only petroleum distillates with relatively low vapor pressure are used. Therefore, as halogenated solvents are not used, the cold cleaner is not subject to NESHAP for Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; Federal Register / Vol. 59, No. 231 / Friday, December 2, 1994).

A cold-cleaner is subject rule 336.611 or 336.1707 depending on if it is existing or new. 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 (Rule 707) cold cleaners were placed into operation on or after July 1, 1979.

I asked Mr. Pinneo to ensure that the cold-cleaner is kept closed at all times when idled.

The lid is mechanically assisted. The parts cleaner is "sink on a drum" type. It is equipped with spray brush. The lid was closed during the FY 2019 inspection

During the FY 2019 inspection, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules.

Vesco Oil services the unit.

Vesco Oil Solvent: VIC SOL Mineral Spirits (reclaimed), Mineral Spirits (Stoddard solvent) or petroleum hydrocarbons

100% VOC Aliphatic Hydrocarbons CAS # 8052-41-3

100 ppm Ethyl benzene CAS # 100-41-4

25 ppm 1,2,4 Trimethyl benzene CAS # 95-53-6

Flash Point (FP) = 108 °F TCC. Auto Ignition = 490 °F. Boiling Point (BP) = 300-400 °F. Vapor Pressure (VP) = 2.1 mm Hg at 68 °F. Specific Gravity (SG) = 0.79 at 60 °F. Density (ρ) @ 60 °F = 6.59 lbs. / gallon (0.790 kg /L). Flammability Range = 0.5 %v (LEL) – 6.0 %v(UEL).

Gun cleaner

One (1) gun cleaner with 5-gallon reservoir is present. It is equipped with spray pump. Unlike above cold-cleaner, which uses Stoddard solvent, it uses paint thinners for cleaning guns. Collected solvent is disposed of according to RCRA. Mechanically assisted lid was closed. The above cold-cleaner explanation holds good for gun cleaner as well.

Conclusion

The booths (2) and cold-cleaners (2 including gun cleaner) are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1287(2)(c) (<< 200 gallons per month usage) and Rule 336.1281(2)(h) or Rule 336.1285(2)(r)(iv), respectively. The collision shop meets the conditions of Rule 201 exemption.

NAME J. S. Llananahall DATE 11/07/2018 SUPERVISOR Joyce B.