

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

FY 2015 Insp

P043228582

FACILITY: KARL-HEINZ AUTO CENTER INC		SRN / ID: P0432
LOCATION: 5130 MEIJER DR, ROYAL OAK		DISTRICT: Southeast Michigan
CITY: ROYAL OAK		COUNTY: OAKLAND
CONTACT: Karl-Heinz Krawinkel, President		ACTIVITY DATE: 02/10/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2015 inspection of Karl-Heinz Auto Center, Inc., ("Auto Center" or "Karl-Heinz")		
RESOLVED COMPLAINTS:		

P0432 - SAR - 2015 02 10

Karl-Heinz Auto Center, Inc. (P0432)
5130 Meijer Drive
Royal Oak, Michigan 48073

Ph: 248-280-4610
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E-mail: karlheinzautocenter@gmail.com

VN: AQD issued Violation Notice dated March 14, 2013.

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 Karl-Heinz Auto Center'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. Karl-Heinz Auto Center does not use halogenated solvents.

On February 10, 2015, I conducted a level-2 self-initiated inspection of Karl-Heinz Auto Center, Inc., ("Auto Center" or "Karl-Heinz") located at 5130 Meijer Drive, Royal Oak, Michigan 48073. 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. Karl-Heinz Krawinkel (Phone: 248-280-4610; Fax: 248-280-0340; E-mail: karlheinzautocenter@gmail.com), President and Owner, assisted me.

Ms. Laura Krawnkel (Phone: 248-280-4610; Fax: 248-280-0340), Treasurer and Secretary, was not present.

Auto Center specializes in German cars such as BMW, Mercedes Benz, etc.

Paint spray booth

A 20 ft. D * 14 ft. W * 10 ft. H enclosed paint spray booth is equipped with a filter system (retrofitted with a downdraft filter system after Violation Notice; filters were previously housed in a cabinet but the system was disabled). Air flow direction is downdraft. Air-intake filters are also present for higher finish quality. During the March 7th, 2013, inspection, the paint overspray arrester filters located in a cabinet were removed. Refer to March 14, 2013, Violation Notice.

Painting is done only for regular maintenance and repair customers; only fender bender accidents and corrosion. Consequently, about 2 gallons of paint per month is used. After the VN, the booth is retrofitted a downdraft filter system. Intake air is filtered to obtain good finish. I confirmed retrofit down filter system during the repeat inspection of May 31, 2013.

I asked Mr. Karl-Heinz Krawinkel 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(c).

The downdraft filters (cabinet filters do NOT exist anymore) were in good condition during the FY 2015 inspection.

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

Upon keeping usage records, the coating booth meets all of the Rule 336.1287(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

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

About March 2013, I showed Ms. Laura Krawnkel DEQ training and assistance materials on the website:

http://www.michigan.gov/deq/0,4561,7-135-3310_4148-192582--,00.html

Again during the FY 2015 inspection, I showed Mr. Krawnkel, NESHAP / MACT 6H fact-sheet, video training materials, notification forms (Initial & Final Compliance Status), etc.

Parts Cleaner

There is one (1) parts-cleaner or cold-cleaner or degreaser at the service shop. It is "sink-on-a-drum" type. 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 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.

I found the cold-cleaner's lid open when not in use (March 7, 2013); I asked Mr. Krawinkel 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. The lid was open with solvent splashing during the March 7, 2013, inspection and AQD issued March 14, 2013, Violation Notice. Upon confirmation inspection of May 31, 2013, the lid was closed and AQD decal concerning cold-cleaner work-practice was posted.

During the March 2013 inspection, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. During FY 2015 inspection, the procedures were posted.

Vesco Oil services the unit.

Vesco Oil Solvent: VIC SOL Mineral Spirits (reclaimed)

Mineral Spirits (Stoddard solvent) or petroleum hydrocarbons

Flash Point (FP) = 108 °F TCC. Auto Ignition = 490 °F. Boiling Point (BP) = 392 °F. Vapor Pressure (VP) = 10 mm Hg at 100 °F. Specific Gravity (SG) = 0.79 at 60 °F. Density (ρ) @ 60 °F = 6.59 lbs. / gallon (0.790 kg /L). Flammability Range = 0.9 (LEL) – 7.0 (UEL)

March 14, 2013, Violation Notice

AQD issued the Violation Notice dated March 14, 2013, for removing the paint spray booth filters (Rules 201, 910) located in a cabinet and for operating cold cleaner improperly (Rules 707, 910: open lid and solvent splashing). AQD received VN response letter dated April 3, 2013. The letter stated "Spray Booth Products, Inc." would repair the booth.

Upon repeat inspection of May 31, 2013, I confirmed that Spray Booth Products, Inc. (Ken Mikols, Cell: 734-320-6394) of Livonia retrofitted the booth with a downdraft filter system. Also, AQD decal concerning cold-cleaner work-practice was posted near the parts cleaner. Mechanically assisted lid was kept closed.

These facts were confirmed during the FY 2015 inspection as well and the newly installed down-draft filter system was operating properly.

Conclusion

AQD issued March 14, 2013, Violation Notice. Upon issuance of the Violation Notice, the paint spray booth is retrofitted with downdraft filter system (cabinet filters are not used anymore), the cold-cleaner's lid is kept closed and the AQD Decal for parts cleaner is posted.

NAME J. Stenmahall DATE 02/19/2015 SUPERVISOR CTE