

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

N364440545

FACILITY: Royal Truck & Trailer Sales & Service, Inc.		SRN / ID: N3644
LOCATION: 23360 SHERWOOD, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Carl Bumgardner, Owner		ACTIVITY DATE: 04/11/2017
STAFF: Robert Joseph	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Air Compliance Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On Tuesday April 11, 2017, Michigan Department of Environmental Quality-Air Quality Division staff Robert Joseph and Sebastian Kallumkal conducted an unannounced inspection of Royal Truck & Trailer Sales located at 23660 Sherwood Avenue, Warren, Michigan. The purpose of the inspection was to verify the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmentally Quality-Air Quality Division (MDEQ-AQD) Administrative Rules and conditions of Permit to Install (PTI) No. 102-15.

We arrived at the facility at about 10am and we were greeted by the General Manager Frank Shields. We introduced ourselves and stated the purpose of our inspection to Frank and he accompanied us into the facility. We visited the sandblasting booth (EUGarnetblasting) which includes an exhaust unit equipped with removable filters as a pollution control medium. This operation is performed on semi-trucks and trailers.

He accompanied us to the outside of the building to show us the filters for the booth. We observed (6) filters to be in-place, however, there was a gap between them indicating that additional filters are required. Frank indicated that the facility would install the additional filters sized at (20 x 20 x 2) inches to accommodate the gap present. Once the additional filters were installed, Frank agreed to take a photograph and send the picture to me. Per the permit, the filter replacements are to be documented per the permit special condition (VI) Monitoring/Recordkeeping.

Also, the permit per condition (III) Process/Operational Restrictions, states the Garnet blasting shall not operate more than 1500 hrs per 12-month rolling time as determined at the end of each calendar month. Furthermore, it states a log shall be kept of the hours of operation of Garnet blasting per calendar month and per 12-month rolling time period as determined at the end of each calendar month. The records shall be made available to the Department upon request. In addition, the permit per condition (VI) Monitoring/Recordkeeping states the number of hours of Garnet blasting shall be monitored and recorded on a weekly basis. Frank expressed that approximately 10 hrs of blasting time is performed each month and the spent filters are disposed of when replaced. The facility did not provide recordkeeping data regarding these operations.

In addition, we observed (2) paint booths which are not included in the permit. These paint booths apply a primer and top coatings to all semi-trucks and trailers after they receive the Garnet blasting. After the coatings are applied, these booths are first heated and then cooled to cure the paint. The filters are replaced on a weekly or monthly basis depending on the hours of painting performed. All paint application equipment is soaked with solvents in buckets. However, the buckets lacked lids and the facility was advised to keep the buckets covered. A five (5) gallon distillation unit is used to recycle all solvents. The recycling of the solvents is exempt per rule R 336.1285 (Rule 285) (u) which states solvent distillation and antifreeze reclamation equipment that has a rated batch capacity of not more than 55 gallons.

Conclusion

Royal Truck & Trailer Sales did not have any recordkeeping information to provide to the us at the end of the inspection. I informed Frank that I would send the facility an email the following day on April 12, 2017 requesting the following information;

- 1) Pollution Control Equipment: The replacement frequency of the sandblaster filters and records of such replacements.
- 2) Records of hours of operation of the sandblaster.
- 3) Safety Data Sheet (SDS) for the most frequently used coating
- 4) Amount of paints and solvents used in both booths in 2015 and 2016 (on a monthly basis) for each booth.
- 5) Photograph of exhaust filter with appropriate number of filters in-place.

After several phone and email discussions the facility submitted the incomplete and inadequate information to the Air Quality Division on May 30, 2017. The facility has not responded to the department's most recent information request on June 19, 2017. In addition, as described above, the facility installed two (2) paint booths without obtaining a permit to install, but did not provide the information to prove that these booths are exempt from PTI requirements per Rule 287. Therefore, a violation notice is being issued to the facility to seek compliance with these violations.

NAME Robert Joseph

DATE 07/13/17

SUPERVISOR SK