

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

N364456265

<b>FACILITY:</b> Royal Truck & Trailer Sales & Service, Inc.		<b>SRN / ID:</b> N3644
<b>LOCATION:</b> 23660 SHERWOOD, WARREN		<b>DISTRICT:</b> Warren
<b>CITY:</b> WARREN		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Brian Billings , General Manager		<b>ACTIVITY DATE:</b> 11/17/2020
<b>STAFF:</b> Rem Pinga	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> On-site Inspection		
<b>RESOLVED COMPLAINTS:</b>		

**On November 17, 2020, I conducted an on-site inspection at Royal Truck & Trailer Sales & Service, Inc. located at 23660 Sherwood Avenue, Warren, Michigan. 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 (PTI) No. 102-15.**

**To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. I set up the inspection via telephone call with Mr. Brian Billings, General Manager and facility contact person. After I entered the main entrance, I found out that the front lobby was actually an automotive parts store display area. I showed my ID and requested to see Mr. Billings and I was brought to the second floor conference room. I entered the facility wearing a face mask, face shield, safety glasses, hard hat, and safety shoes. Mr. Billings accompanied me during the walk-through inspection and wore face mask.**

**Mr. Billings mentioned that the facility fabricates and/or repairs truck trailers and truck bodies. During walk-through inspection, I observed a truck box being fabricated for one of the truck beds in one room. I observed cutting, welding, and miscellaneous fabrication equipment all over the facility. The welding process is exempt from permit to install requirements per AQD Administrative Rule 285(2)(i). Equipment for cutting, routing, turning, drilling, machining, grinding, sanding, buffing, etc., are exempt from permit to install requirements per AQD Administrative Rule 285(2)(I)(vi).**

**PTI No. 102-15 was issued for an enclosed Garnet blasting operation (similar to sandblasting). The blasting room includes an exhaust unit equipped with removable filters. "Australian GMA" Garnet abrasive material is used as the blasting material and a disposable 3-ply polyester link filter system is used for particulate emissions control. During walk-through inspection, Mr. Billings took me around the facility including the**

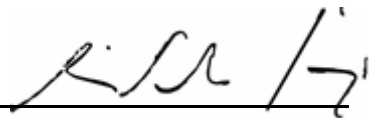
**Garnet blasting operation. Per PTI No. 102-15, Special Condition no. EUGARNETBLASTING (III.1), the facility submitted records through email. The highest monthly 12-month rolling total hours of operation from November 2019 through October 2020, occurred in October 2020 at 82.52 hours and less than the 1500.00 hours permit limit. During walk-through inspection, Mr. Billings took me outside the building to observe the filters which appeared clean and no gaps. Records showed that the filters were replaced in August 2020 and at about 50 hours from the last filter change. I reminded Mr. Billings to make sure and monitor the filter changes to comply with the 50 hours permit condition.**

**In another section, Mr. Billings took me to see the 2 spraybooths that are under AQD Administrative Rule 287(2)(c), permit to install exemption. At the booths and per AQD Administrative Rule 287(2)(c)(ii), I observed the dry filters in place, no gaps in between filters, and appeared to be operating properly. The facility uses HVLP spray guns. I observed the paint container lids closed when not in use in the mixing room. The submitted monthly coating usage for the combined booths, from November 2019 through October 2020, showed less than 50 gallons sprayed for the two booths. The highest usage occurred in March 2020 at 19.32 gallons and less than the 200 gallons per month exemption requirement for each booth under AQD Administrative Rule 287(2)(c)(i). Per AQD Administrative Rule 287(2)(c)(iii), the facility submitted monthly coating use records.**

**I observed 2 parts washers with the following opening dimensions: 18" x 32" and 35" x 22", showing less than 10 square feet surface area each. The parts washers appeared to meet AQD Administrative Rule 281(2)(c) permit to install exemption due to air/vapor interface of not more than 10 square feet. During walk-through inspection, the lids were closed, and safety instructions were posted at each unit. I also gave Mr. Billings 2 extra safety instruction stickers (AQD printed), as future replacement for worn out safety instructions.**

**Overall, I did not find any non-compliance issues during inspection.**

NAME

DATE December 4, 2020

SUPERVISOR

