



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 22, 2014

Mr. Brian J. Brunt
Brunt Associates Carpentry and Millwork
48953 Wixom Tech Drive
Wixom, Michigan 48393-3558

SRN: P0577, Oakland County

Dear Mr. Brunt:

VIOLATION NOTICE

On October 24, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Brunt Associates Carpentry and Millwork (Brunt Associates), located at 48953 Wixom Tech Drive, Wixom, Michigan. The purpose of this inspection was to determine Brunt Associate'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); and the administrative rules.

During the October 24, 2014 inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
15 ft. W * 20 ft. L 10 ft. H backdraft paint spray booth with a dry filter system	Rule 336.1201 (Permit-to-Install)	Brunt Associates Carpentry and Millwork (Brunt Associates) installed the Painting Process without obtaining a Permit-to-Install prior to commencing the painting operation. Filter panels (especially, two panels) were installed with gaps and holes.
15 ft. W * 20 ft. L 10 ft. H backdraft paint spray booth with a dry filter system	Rule 336.1910 (Air cleaning devices)	By not properly installing filter panels, Brunt Associates bypassed the filter system or disabled it. In addition, on December 4, 2014, Brunt Associates operated the booth with doors open (both doors: near the filter system and main entrance). The open doors interfere with air flow from filtered make-up air and exhaust air through the filter system. Furthermore, product quality would be diminished due to contamination by saw dust particulate matter.

⁹ Alternatively, Brunt Associates may install a coating line that 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 two-year period and are made available to the air quality division upon request.

In addition, proper operation, as designed and intended, of the booth is mandatory. Only air flow must be from make-up air filter system (clean) to exhaust air filter system (dirty with paint overspray). This requirement helps upgrade product quality.

During this inspection, it was noted that Brunt Associates had installed and/or commenced operation of an unpermitted paint spray booth at this facility. The AQD staff advised Brunt Associates on October 24, 2014, that this is a violation of Act 451, Rule 201.

As stated above, according to Rule 287, a program for compliance may include installation and operation of the filter system properly, keeping monthly paint and solvent usage records to demonstrate that usage is below the threshold (200 gallons per month).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

On October 24, 2014, the AQD staff observed operation of the paint spray booth while the dry filter system, which arrests paint overspray particles, was malfunctioning as a result of improper installation of the filter panels. Proper action is to inspect the filter system periodically and replace filter panels if necessary. Also, pressure drop across the filter system due to air flow may be monitored using an inclined manometer or a magnehelic pressure gauge.

This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

About one dozen wood cutting, grinding, milling, and sanding machines are exempt from Rule 336.1201 (Permit-to-Install) provided all saw dust emissions are captured by capture devices and delivered, using a common exhaust manifold, to a baghouse such as one that already exists. A pre-cleaner such as a cyclone for large particles (wood chips) may improve/extend bag life.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 12, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violation is ongoing; a summary of the actions that have been taken and are proposed

to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Brunt Associates believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Brunt Associates. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-753-3741 or konanahalli@michigan.gov

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ