

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

P104854756

<b>FACILITY:</b> Ray's Radiator Clinic, Inc.		<b>SRN / ID:</b> P1048
<b>LOCATION:</b> 6550 Cobb Drive, STERLING HTS		<b>DISTRICT:</b> Warren
<b>CITY:</b> STERLING HTS		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Raymond M. Ruminski , President		<b>ACTIVITY DATE:</b> 08/07/2020
<b>STAFF:</b> Robert Elmouchi	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled inspection.		
<b>RESOLVED COMPLAINTS:</b>		

On July 7, 2020, I conducted an unannounced scheduled inspection of Ray's Radiator Clinic, Inc. (SRN: P1048). This facility is located at 6550 Cobb Drive, Sterling Heights, MI. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the administrative rules.

Ray's Radiator Clinic (Ray's) performs custom restoration, surface preparation (sandblasting), and powder coating of metallic parts.

I entered the facility, introduced myself, and presented identification to Raymond Robert Ruminski. **CORRECTION NOTE:** in my previous activity reports I identified the owner and father as Mr. Raymond Ruminski Sr. and his son as Mr. Raymond Ruminski Jr. On July 7, 2020, I learned that the father and son are not Sr. and Jr. The father is Mr. Raymond Matthew Ruminski and the son is Raymond Robert Ruminski. Ms. Sylvia Ruminski is the corporation's Secretary.

During a previous inspection, I determined that Ray's Radiator Service was in violation of R 336.1201(1) for installing and operating a sandblasting booth with externally vented baghouse without a mechanical precleaner. Raymond Robert Ruminski stated that the baghouse had been disconnected and has not been operated. I walked to the back exterior of the property and observed that all of the previously connected external ductwork was disconnected and rendered inoperable.

I then observed the powder coat spray booth. The spray booth has a particulate control system consisting of a grid wall with 12 pocket filters. One of the pocket filters had been removed and replaced with an exhaust fan (photo inserted in this report). I discussed the removal of the pocket filter with Raymond Robert Ruminski. He stated that he inserts the fan only when he needs to exhaust hot air from the building. Mr. Ruminski stated that heat from the powder coat oven stagnates in the building and he used the spray booth to exhaust the hot air. Mr. Ruminski's statement appeared reasonable because the temperature that day was about 98 degrees outside. I asked him to show me the pocket filter he had recently removed, and he stated he did not know where it was. I observed that the fan appeared securely attached to the filter frame. I explained that removing the pocket filter presented the opportunity to operate the spray booth in a non-compliant manner. I asked Mr. Ruminski why he does not use the spray booth exhaust fan to remove the hot air from the building and he stated that it costs more to operate the spray booth fan. I then asked Mr. Ruminski to turn on the spray booth fan so I could confirm it operates properly. Mr. Ruminski attempted to turn on the spray booth exhaust fan from the circuit breaker panel multiple times, but it would not operate. Mr. Ruminski stated that the fan must have just failed.

The pocket cube filters I observed appeared to be the correct filter media for powder coating.

On July 9, 2020, I called Ray's Radiator Clinic, Inc. and spoke with Mr. Raymond Matthew Ruminski and we discussed my observations regarding compliance. Later that day I received photos via email, which appeared to demonstrate the exhaust fan had been removed from the filter bank. Per our discussion, I followed up the telephone conversation with the following letter:

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Mr. Raymond Matthew Ruminski  
Ray's Radiator Clinic, Inc.

6550 Cobb Drive  
Sterling Heights, MI 48312-2622 SRN: P1048, Macomb County

Dear Mr. Ruminski:

#### NOTICE

On July 7, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Ray's Radiator Clinic, Inc. located at 6550 Cobb Drive, Sterling Heights, Michigan. The purpose of this inspection was to determine Ray's Radiator Clinic'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 Air Pollution Control Rules; and to conduct a follow-up investigation regarding complaint number C-19-01877 and the associated violation notice dated July 18, 2019.

During the inspection on July 7, 2020, I observed that ducts exhausting from the sandblasting room to the baghouse were disconnected and particulate fallout had been removed, which appears to resolve the R 336.1201(1), R 336.1370(1), and R 336.1910 violations associated with the baghouse control device. Thank you for your attention to resolving the violations related to the sandblasting room baghouse control device.

During the inspection on July 7, 2020, I observed the powder coating booth, which had been cited in the violation notice dated July 18, 2019. Per my observations during the July 7, 2020, inspection, Ray's Radiator Clinic has not resolved the R 336.1201(1), and R 336.1910 violations. During this inspection, I observed that Ray's Radiator Clinic had removed one of twelve fabric filters from the powder coat spray booth filter grid and replaced it with an approximately 20" square exhaust fan. I also observed that the spray booth exhaust system was inoperable. The modification of the powder coating booth fabric filter and failure to maintain the spray booth exhaust system excludes Ray's Radiator Clinic from using the R 336.1287(2)(d) exemption from the R 336.1201(1) requirement to obtain an air use permit.

Also, please convey to Mr. Raymond Robert Ruminski that per our discussion, I researched how the air pollution control rules apply to using a fan in the spray booth to exhaust hot air from the general in-plant environment. The proposed activity is prohibited per R 336.1280, which only exempts, "... ventilating systems not designed or used to remove air contaminants generated by, or released from, specific units of equipment." The spray booth filters are used to remove air contaminants; therefore, the cooling and ventilating exemption does not apply to a spray booth

During our July 9, 2020, telephone conversation we discussed the requirement to maintain the fabric filter control device and repair the spray booth exhaust system. Please be advised that Ray's Radiator Clinic appears to be in violation of R 336.1201(1), and R 336.1910. Therefore, the AQD may issue a second violation notice and may pursue escalated enforcement.

Please provide a written response by July 29, 2020. The written response should include:

- the dates the violations occurred.
- an explanation of the causes and duration of the violations,
- whether the violations are 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.

Thank you for your attention towards resolving the violations related to the sandblasting room baghouse, for the cooperation that was extended to me during the inspection on July 7, 2020, and our telephone conversation on July 9, 2020. If you have any questions regarding the violations or the actions necessary to comply with Michigan's Air Pollution Control Rules, please feel free to contact me at [elmouchir@michigan.gov](mailto:elmouchir@michigan.gov) or the telephone number listed below.

Sincerely,

Robert Elmouchi  
Senior Environmental Quality Analyst

Air Quality Division

586-854-3244

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On July 27, 2020, the AQD received a written response, which appeared to satisfactorily address the proper operation and maintenance of the particulate material control device.

On August 7, 2020, I conducted an unannounced inspection to determine if corrective actions had occurred in a timely manner. Before entering the building, I approached the spray booth exhaust stack and heard the exhaust fan running, which appeared to indicate compliant operation. I entered the building and met with Mr. Raymond Robert Ruminski. I observed the spray booth filter bank. I saw that one filter was a flat panel whereas all other filters were pocket filters. I asked Mr. Raymond Robert Ruminski to replace the flat filter with a pocket filter, which he did immediately. I also asked Mr. Ruminski to fix filter placements because there were some gaps where filters fit the frame. Mr. Ruminski fixed the filter placement immediately. I also observed that the exhaust fan had been removed from the exhaust filter bank.

It appears that Ray's Radiator Clinic has corrected the non-compliant conditions I had observed on July 7, 2020.

#### CONCLUSION

Ray's Radiator Service appears to be in compliance with the Michigan air pollution control rules. The AQD should conduct annual inspections until repeat determinations of compliance have been documented.

NAME Robert Umarchi DATE August 27, 2020 SUPERVISOR Joyce Z