



STATE OF MICHIGAN
 DEPARTMENT OF
 ENVIRONMENT, GREAT LAKES, AND ENERGY
 WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
 DIRECTOR

GRETCHEN WHITMER
 GOVERNOR

July 18, 2019

Mr. Raymond M. Ruminski
 President
 Ray's Radiator Clinic, Inc.
 6550 Cobb Drive
 Sterling Heights, MI 48312

SRN: P1048, Macomb County

Dear Mr. Ruminski:

VIOLATION NOTICE

On July 8 and July 10, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Ray's Radiator Clinic 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 investigate a recent complaint which we received on July 8, 2019, regarding opacity and fallout attributed to Ray's Radiator Clinic's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Powder Coating Booth	R 336.1201(1)	Source failed to comply with the R 336.1287(2)(d) exemption from R 336.1201(1) because the source failed to properly install, maintain and operate particulate control system. Furthermore, the company did not operate the powder coating booth in accordance with the manufacturer's specifications nor did the owner develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.
Powder Coating Booth	R 336.1370(1)	Source failed to dispose of air contaminants in a manner so as to minimize the introduction of contaminants to the outer air.

Powder Coating Booth	R 336.1910	Source failed to maintain and operate an air cleaning device in a satisfactory manner and in accordance with these rules and existing law.
Sandblasting room with a fabric filter baghouse that has externally vented emissions.	R 336.1201(1)	Source failed to comply with the R 336.1285(2)(l)(vi)(C) exemption from R 336.1201(1) because the source failed to install a mechanical precleaner preceding the fabric filter collector.
Sandblasting room with a fabric filter baghouse that has externally vented emissions.	R 336.1370(1)	Source failed to dispose of air contaminants in a manner so as to minimize the introduction of contaminants to the outer air.
Sandblasting room with a fabric filter baghouse that has externally vented emissions.	R 336.1910	Source failed to maintain and operate an air cleaning device in a satisfactory manner and in accordance with these rules and existing law.

During this inspection, it was noted that Ray's Radiator Clinic had installed and commenced operation of a powder coating booth and sandblasting booth at the facility. The operation and maintenance of the powder coating and sandblasting booths did not satisfy the criteria for the corresponding exemptions from Rule 201. The AQD staff advised Ray's Radiator Clinic on July 10, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the powder coat spray booth, and sandblasting booth process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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.

Ray's Radiator Service appears to be in violation of R 336.1370 for disposing air contaminants from the powder coat spray booth and sandblasting booth in a manner that does not minimize the introduction of contaminants to the outer air. During this inspection, the AQD staff advised Ray's Radiator Clinic on July 10, 2019, that this is a violation of Rule 370 of the administrative rules promulgated under Act 451.

On July 10, 2019, AQD staff was informed that the powder coat spray booth had been operated without the particulate filters installed. Additionally, the observed routing of wires and an electrical cable through the exhaust filter grid prevents the proper installation of particulate filters. These conditions constitute a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be

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installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

On July 10, 2019, AQD staff observed the operation of the sandblasting booth fabric filter dust collector. Per the visible emissions observed, it appeared that that fabric filter baghouse was malfunctioning. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, 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.

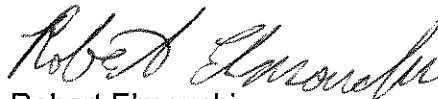
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **August 8, 2019**, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ray's Radiator Clinic 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 inspections of July 8 and July 10, 2019. 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,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE