



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

March 16, 2020

Mr. Douglas Neynaber, Owner  
Doug's Tree and Lawn Care  
3809 Airport Road  
Waterford Township, MI 48329

SRN: P1117, Oakland County

Dear Mr. Neynaber:

**VIOLATION NOTICE**

On March 10, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Doug's Tree and Lawn Care located at 3809 Airport Road, Waterford Township, Michigan. The purpose of this inspection was to determine Doug's Tree and Lawn Care'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 Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Space heater fueled by used/waste oil.	Rule 201	Doug's Tree and Lawn Care installed a waste oil burning space heater without obtaining a permit to install. Most of the waste oil used is not generated on the geographical site.

During this inspection, it was noted that Doug's Tree and Lawn Care had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Mr. Doug Neynaber on March 9, 2020, 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 unpermitted process equipment. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air) (in the shaded box on the upper right-hand side of the page).

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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.

Alternatively, this process may be exempt under Michigan Air Pollution Control Rule, **R336.1282 (2)(b)(iv)** which states, in part:

**R 336.1282 Permit to install exemptions; furnaces, ovens, and heaters.**

Rule 282. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(b) Fuel-burning equipment, which is used for space heating, service water heating, electric power generation, oil and gas production or processing, or indirect heating and which burns only the following fuels:

(iv) Waste oil or used oil fuels that are generated on the geographical site and the equipment has a rated heat input capacity of not more than 500,000 BTU per hour.

If Doug's Tree and Lawn Care decides to operate pursuant to this exemption Rule **(R336.1282 (2)(b)(iv))**, then the company must only utilize waste oils that are generated on the geographical location of the space heater. Also, the space heater must have a maximum heat input capacity of not more than 500,000 BTU per hour.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 6, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Doug's Tree and Lawn Care 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.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Adam Bognar".

Adam Bognar  
Environmental Engineer  
Air Quality Division  
586-753-3744

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