

## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

KALAMAZOO DISTRICT OFFICE



October 9, 2019

Mr. Eric Waddell BlasTek LLC P.O. Box 443 Middleville, Michigan 49333

SRN: U031909080, Allegan County

Dear Mr. Waddell:

## **VIOLATION NOTICE**

On August 29, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of BlasTek LLC located at 43 122<sup>nd</sup> Avenue, Shelbyville, Michigan. The purpose of this inspection was to determine BlasTek LLC'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 August 21, 2019, regarding (fugitive dust/black smoke, foul odors, burned rubber odors, solvent odors, sand blasting, fugitive dust, etc.) attributed to the sand blasting operations.

During the inspection, staff observed the following:

| Process<br>Description | Rule/Permit<br>Condition<br>Violated | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sand Blasting<br>Area  | Rule 201                             | The facility has one sandblasting area that is located on the outside of the general in-plant environment. The location does have a roof over the area but does include three walls that are open to the outside environment. Staff stated that in order for the facility to exhaust emissions outside the sandblasting operation would have to be controlled by an appropriately designed and operated fabric filter. Staff did note a considerable amount of silica fallout that was around the station from being used. |
| Shot Blasting<br>Area  | Rule 201                             | The facility has one shot blasting area that is located in a structure outside of the general in-plant                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|              |          | environment. The structure is enclosed on all sides but one. Staff did note that because of the open wall emissions would exhaust to the outside without being controlled an appropriately designed and operated fabric filter. |
|--------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Coating Line | Rule 201 | The facility does have two trailer bays in which they will use as coating lines. The facility was not able to produce monthly usage records showing that they are coating less than 200 gallons, as applied, minus water.       |

During this inspection, it was noted that BlasTek LLC had commenced operation of an unpermitted process at this facility. The AQD staff advised BlasTek LLC on August 29, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may also include a completed PTI application for the sand blasting, shot blasting, and coating line 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 25, 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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If BlasTek LLC 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 violations cited above and for the cooperation that was extended to me during my inspection of BlasTek. 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,

Cody Yazzie

Environmental Engineer Air Quality Division

269-567-3554

## Enclosure

cc: Ms. Mary Ann Dolehanty, EGLE

Dr. Eduardo Olaguer, EGLE Ms. Jenine Camilleri, EGLE

Mr. Christopher Ethridge, EGLE

Mr. Rex Lane, EGLE