



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

October 6, 2017

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bill Jones
BNM Trailer Sales, Incorporated
7577 North Hollister Road
Elsie, Michigan 48831

SRN: U191612206, Clinton County

Dear Mr. Jones:

VIOLATION NOTICE

On October 2, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of BNM Trailer Sales, Incorporated located at 7577 North Hollister Road, Elsie. The purpose of this inspection was to determine 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 complaints which we received on November 21, 2016, September 27, 2017, and October 5, 2017 (after my inspection) regarding fugitive dust attributed to sand blasting operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Sand Blasting Process	R 336.1201 (Rule 201) - Permits to Install (PTI)	The sand blasting process was operating without an appropriately designed and operated fabric filter collector.
Sand Blasting Process	R 336.1370 (Rule 370) - Collected air contaminants	Piles of dust and particulate had accumulated outside on the ground from the process.

The AQD staff observed operation of the sand blasting process while the air cleaning device was malfunctioning (e.g., the fabric filters were not in the exhaust system ventilation). Particulate was observed coming out of the exhaust vent. This is a violation of Department Rule 201 which requires a permit to install for sources of air contaminants unless the process meets the requirements of a permit exemption.

The sand blasting process could be exempt from permitting once the fabric filters are placed back in the process, and the following requirements in R 336.1285(2)(l)(vi)(C) are met:

R 336.1285 Permit to install exemptions; miscellaneous.

Rule 285. (2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- (l) The following equipment and any exhaust system or collector exclusively serving the equipment:

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

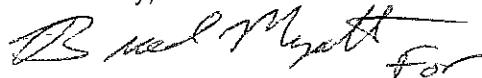
Also, AQD staff witnessed piles of dust and particulate that had accumulated on the ground outside of the sand blasting room. This is a violation of Department Rule 370, which requires the collection and disposal of air contaminants be performed in a manner so as to minimize the introduction of contaminants to the outer air. Please explain how the piles accumulated and the measures that will be taken to properly dispose of the dust and particulate without creating additional fugitive dust in the process of disposal. Documentation of proper disposal is requested with this response to the violation notice. Please provide the Safety Data Sheets (SDS) for the materials used in the sand blasting process as part of the documentation of proper disposal.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 27, 2017. 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.

If you believe 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. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie L. Brunner" with a stylized flourish at the end.

Julie L. Brunner, P.E.
Senior Environmental Engineer
Air Quality Division
517-284-6789

JLB:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ