



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

September 17, 2018

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

SRN: U191612206, Clinton County

Dear Mr. Jones:

VIOLATION NOTICE

On August 24, 2018 and September 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted another complaint investigation of BNM Trailer Sales, Incorporated (BNM) located at 7577 North Hollister Road, Elsie. This investigation was in response to renewed complaints and to determine compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules.

During the inspections, 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 not meeting the requirements of an exemption. (i.e., emissions escaping the general in plant environment).
Sand Blasting Process	R 336.1370 (Rule 370) - Collected air contaminants	Piles of dust and particulate had accumulated in the plant environment and were not properly collected.

As a result of the August 24, 2018 and September 13, 2018 inspections, staff have concluded that the sand blast process is not meeting the intent of the exemption because the enclosure is not adequately containing all of the emissions generated by the sand blasting operation. Furthermore, accumulated dust in the building is not being properly collected and contained in a timely and acceptable manner. These are violations of Rule 201 and Rule 370.

In addition, BNM previously received two (2) violation notices associated with the sand blasting process on October 6, 2017 and December 15, 2017. Part of your response to the previous violations was to have a new sand blasting process installed and operating by May 1, 2018. On August 24, 2018, it was verified that the new sand blasting operation was not operating. The reason given was that the building had no power, but the equipment was on-site and being stored. No deadline was given for when power would be provided, and the new sand blasting operation operating. Your responses to the previous violation letters have proved to be ineffective in resolving the violations, which now remain ongoing for approximately 12 months.

Therefore, please submit a written response to this Violation Notice. The written response should include:

1. A summary of the actions that have been taken and are proposed to be taken to correct the violations.
2. The **dates** by which these actions will take place.
3. The steps being taken to prevent a reoccurrence and the **date** the new sand blasting operation or upgrades to the existing sand blasting operation will be installed and in use.

Please be advised that failure to respond in writing and identifying actions taken to resolve the cited violations may result in escalated enforcement action by the AQD. 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. Continued operation of a process that does not meet the requirements of a PTI exemption is considered a violation of Rule 201 and can result in escalated enforcement action by the AQD, which could result in fines. Please provide the information requested by September 24, 2018, which corresponds to 7 days from the date of this letter.

Please submit the written response to the DEQ/AQD, Lansing District Office, Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ/AQD, Constitution Hall, 525 West Allegan, Second Floor South, P.O. Box 30260, Lansing, Michigan 48909.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violation or the action necessary to bring BNM into compliance, please contact me at the telephone number listed below.

Sincerely,



Julie L. Brunner, P.E.
Senior Environmental Engineer
Air Quality Division
517-275-0415

JLB:TG

cc via/email: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Brad Myott, DEQ