

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

U4711055249426

FACILITY: Truck-Tech Refurbishing Inc.		SRN / ID: U47110552
LOCATION: 1880 Hydraulic Drive, Howell		DISTRICT: Lansing
CITY: Howell		COUNTY: LIVINGSTON
CONTACT: Steve Phillips ,		ACTIVITY DATE: 06/26/2019
STAFF: Samantha Braman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Unannounced self-initiated inspection after learning of a complaint received by Rebecca of RRD involving sand blasting.		
RESOLVED COMPLAINTS:		

**U47110552 - Truck-Tech Refurbishing Inc.****Facility Contacts:**

Ed Jacques – Owner

Steve Phillips – Owner – 517-618-8977 – [steve@truck-tech.com](mailto:steve@truck-tech.com)**MDEQ AQD Personnel:**Samantha Braman – (517) 282-1373, [bramans1@michigan.gov](mailto:bramans1@michigan.gov)**Facility Description:**

Truck Tech rebuilds trucks and trailers. They do refurbishing, painting, graphics, abrasive blasting etc.

This facility does not have any permits through AQD.

**Safety Equipment Required:**

Eye protection.

**Location:**

This facility used to be located at 1880 Hydraulic Drive, Howell, MI, but recently (about 3 years ago) built a new facility now located at 5900 E Highland Rd, Howell, MI.

Located about 6 miles NE of downtown Howell. Some residences nearby but not densely populated. Good tree buffer between residential area and building.

**Previous Complaints:**

10/27/2011

"Multi-media complaint regarding improper disposal of hydraulic oil, sandblasting debris and wash water. Air quality was notified of complaint due to alleged open burning of plastics and pallets in a burn barrel."

Result: AQD staff drove by facility, parked nearby, and watched facility for approximately 30 minutes around 930 a.m. Did not witness any open burning.

**Previous Violations:**

Appears that a letter of violation was sent November 2011 for the following:

Rule 310: open burning of waste in burn barrel discovered during multimedia inspection

Rule 201: company did not have a permit for an installed paint booth and sand blasting booth

Rule 370: collected baghouse dust disposed of improperly.

This violation was resolved 10/17/2012 but does not indicate how.

**Inspection Summary:**

This was an unannounced, self-initiated inspection. I received information from RRD about a complaint they received for this facility. RRD staff passed this information to me due to what they believed to be an air quality concern for a sandblasting process.

I arrived at 3:00pm and did not observe any visible emissions or any odors. I entered the office building where I waited for the front desk staff to get ahold of someone to speak with me. Ed the owner met with me, but indicated he had a 3:30 meeting and would not be able to show me around. Steve, the other owner of Truck-Tech was not at the facility at the time either. Ed asked Jeff, shop supervisor, to show me around the facility. A

walk through of the site was performed followed by a sit-down meeting.

On the walk through I saw the sandblasting area. This is a large self-contained area with a garage door. It is fully contained, and only emits into the in-plant environment. The garage door was open during my visit, but no sandblasting was in operation. Jeff indicated to me that this door is closed during any sandblasting work. However, there was used sandblasting material escaping the room, and there was a large pile of used material in the parking lot getting blown around by the wind. This used media is taken offsite about every 6 months. It was clearly blown around and ground into the gravel lot.

Next, I saw the paint booth. The paint booth is equipped with cross draft air filters and uses High Volume Low Pressure (HVLP) nozzles. They indicated that they replace the filters as needed or about every 2 months. This paint booth was in operation at the time but stopped painting briefly so we could walk through. The second door at the back of the booth was left open, and there were two filters (one from either side) that had been removed. When I asked if these were typically left off during operation, and the answer was no, and were then put back into place. Once the filters were back in place, we watched the pressure gauge on the outside of the booth drop. This pressure drop represents reduced airflow, indicating that the filters needed to be changed.

There is a parts washer on site that is used rarely and just for small items. It just used mineral spirits. It is small, less than 10 square feet, so this meets Exemption Rule 281(2)(h).

Concerns noted:

- Poor housekeeping of sandblasting area. Used media is escaping the designated, enclosed area.
- Improper disposal of used sandblasting material.
- Door to paint booth left open during operation.
- Fabric filters (2) left off during operation.
- Fabric filters not being maintained/replaced properly.
- No permit to install for paint booth, nor are there records to demonstrate they are meeting exemption 287(2)(c).

I provided my business card to Steve when he arrived at the facility following my walk-through with Jeff. We met in a conference room to discuss why I was there and my findings.

I indicated to him some of my concerns noted above. I provided Steve with a copy of the Permit to Install Exemption Handbook and showed to him Rule 285(2)(l)(vi)(B) which indicates that any sandblasting done in an enclosed area and only emitting to in plant environment is exempt. However, we would like to see the pile stored in a way to prevent it from blowing around.

I asked how many gallons per month, as applied, minus water that he thought they used in the paint booth, and he thought maybe 25-30 gallons. I was told that Truck-Tech uses two coatings and add various pigments to them. I also pointed out to Steve in the handbook, Rule 287(2)(c) for surface coating. This exemption states if they are under 200 gallons per month and they have dry filter control that are maintained properly then they would be exempt from needing a permit to install for this process equipment, as long as records are being kept for at least 2 years to demonstrate this.

Prior to leaving the facility on 6/26/19 I asked Steve to send me Safety Data Sheets for the coatings they use, and to get me some paint usage records. Steve indicated they do not keep records of the amount of coatings they use, and I asked if they could use purchase records to get a rough estimate of approximately how much paint they use per month.

Steve emailed me promptly the next business day on 6/27/19 with one of two SDS, Carbothane 8845. He also sent the purchase order for the paint for the month of May. The purchase order was for 40 gallons of paint plus 5 gallons of thinner, for a total of 45 gallons of coating material.

I left the site at 4:30pm.

As a result of this inspection, Truck-Tech is not in compliance with Air Quality Regulations, and therefore a Violation Letter will be sent.

NAME Shirley B. Carr DATE 7/9/19 SUPERVISOR [Signature]

