



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

July 19, 2017

Mr. Carl Bumgardner, CEO  
Royal Truck & Trailer Sales  
23660 Sherwood Avenue  
Warren, MI 48091

SRN: N3644, Macomb County

Dear Mr. Bumgardner:

**VIOLATION NOTICE**

On April 11 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Royal Truck & Trailer Sales located at 23660 Sherwood Avenue, Warren, Michigan. The purpose of this inspection was to determine Royal Truck & Trailer Sales 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 the conditions of Permit to Install (PTI) number 102-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two paint booths	R 336.1201 (Rule 201)	Installed and operated two paint booths without obtaining a Permit to Install.
EUGarnetblasting	R.336.1910 (Rule 910) Air Cleaning Devices and PTI No. 102-15, Special Condition IV (1)	The Garnetblasting shall not be operated unless the exhaust unit is properly fitted with filters in place. The exhaust unit was not properly fitted with filters.
	PTI No.102-15, Special Condition VI (1) and (2)	A log for the number of blasting hours per week and rolling 12-month period, and a log of the replacement filters of the exhaust unit were required to be kept. No such records were kept.

During this inspection, Royal Truck & Trailer Sales was unable to produce records. This is a violation of the recordkeeping requirements specified in Special Condition numbers (III) and (VI) of PTI number 102-15. The conditions of PTI number 102-15 require monitoring/recordkeeping maintenance of records which shall be made available for review upon request by the AQD staff.

During this inspection, it was noted that Royal Truck & Trailer Sales had installed and commenced operation of two unpermitted paint booths at this facility. The AQD staff advised Royal Truck & Trailer Sales on April 11, 2017, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the paint booth process equipment. An application form is available by request, or at the following website: [www.michigan.gov/degair](http://www.michigan.gov/degair) (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.

On April 11, 2017, the AQD staff observed that the exhaust filter system for EUGarnetblasting was missing filters. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Royal Truck & Trailer Sales may achieve compliance with R. 336.1201 (Rule 201) by doing the following:

- The facility can demonstrate the cited processes can meet the permit exemption pursuant to R. 336.1287 (2)(c).

R.336.1287 in part states:

Rule 287. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(c) A surface coating line if all of the following conditions are met:

(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.

(ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

Mr. Carl Bumgardner

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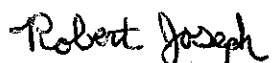
(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 9, 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 Royal Truck & Trailer Sales 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.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Royal Truck & Trailer Sales. 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,



Robert Joseph  
Environmental Engineer  
Air Quality Division  
586-753-3735

cc/via e-mail: Mr. Frank Shields, Royal Truck & Trailer Sales  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Joyce Zhu, DEQ