

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FY 2016 Insp
P0706

ACTIVITY REPORT: Self Initiated Inspection

P070634597

FACILITY: Peters Indoor Range and Gun Shop, Inc.		SRN / ID: P0706
LOCATION: 28631 Gratiot Ave., ROSEVILLE		DISTRICT: Southeast Michigan
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Robert Peters , President & Owner		ACTIVITY DATE: 04/28/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2016 inspection of Peters Indoor Range and Gun Shop, Inc.		
RESOLVED COMPLAINTS:		

P0706 - SAR - 2016 04 28

Peters Indoor Range and Gun Shop, Inc. (P0706)
28631 Gratiot Ave., Roseville, Michigan 48066-4212
U-50-16-0439 is consolidated into SRN P0706

VN: AQD issued May 5, 2016, Violation Notice for Rule 336.1201 (Permit-to-Install) – no filters for particulate and lead (Pb) laden exhaust air.

FY 2016 Complaint – lead (Pb) issue.

C-16-01382, PEAS No. NA, US EPA FY16-141599-3714-CV and FY16-141599-3800-CV (Received: 04/27/2016; Incident: 04/08/2016; Complainant: Anonymous, Issue: Lead (Pb) from gun range. No filters alleged by former employee.

On April 28, 2016, I conducted a level-2 self-initiated, unscheduled (but as a result of complaints to US EPA HQ), inspection of Peters Indoor Range and Gun Shop, Inc. ("Peters"), a gun shop and a shooting range, located at 28631 Gratiot Ave., Roseville, Michigan 48066-4212. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

On April 27, 2016, Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) received the above complaints from a confidential / anonymous complainant, regarding lead fall-out attributable to Peters Indoor and Range Gun Shop. US EPA HQ referred the two complaints (US EPA FY16-141599-3714-CV and FY16-141599-3800-CV) to AQD via US EPA Region V. AQD identified the above stated two complaints as AQD No. C-16-01382.

During the FY 2016 complaint investigation and the inspection, Mr. Robert Peters (Phone: 586-773-7515; Fax: 586-773-6688), Owner, assisted me.

AQD confirmed that Peters Indoor Range and Gun Shop, Inc. ("Peters") is emitting lead (Pb) laden exhaust air from roof vent without any filtration since 1973. The gun shooting range is equipped with five (5) intake air filters for customer / worker comfort, safety and health. The range can accommodate maximum ten (10) customers / shooters at any given time.

Because the shooting range is not equipped with HEPA filters for filtration of lead (Pb) laden exhaust gases, the range is not exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(cc). Filters of HEPA class H14/U15 or better are recommended. AQD issued May 05, 2016, Violation Notice (VN). Please, refer to the violation notice for further information.

Lead (malleable metal, density = 11.34 grams per cubic centimeter [g/cm³] and Melting Point = 621 °F) is neurotoxin that accumulates in soft tissue, brain and bones causing damage to nervous system.

MDEQ-RRD will conduct further investigation regarding lead contamination of the neighborhood (roof and soil) keeping in mind background lead (naturally occurring, lead from gasoline before 1990, etc.). AQD and RRD met to discuss the lead issue on May 16, 2016.

Conclusion

The complaint is resolved. MDEQ-RRD will conduct further investigation. Peters is not in compliance.

FYI: May 05, 2016, VN

May 5, 2016

Mr. Robert Peters
 President & Owner
 Peters Indoor Range and Gun Shop, Inc.
 28631 Gratiot Avenue
 Roseville, Michigan 48066-4212

SRN: P0706, Macomb County

Dear Peters:

VIOLATION NOTICE

On April 28, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Peters Indoor Range and Gun Shop, Inc. (Peters) located at 28631 Gratiot Avenue, Roseville, Michigan. The purpose of this inspection was to determine Peters' 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 administrative rules; and to investigate a recent complaint (C-16-01382 & US EPA FY16-141599-3714-CV) which we received on April 27, 2016, regarding lead fall-out attributed to Peters' operations.

During the April 28, 2016, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Indoor Gun Shooting Range ^β	Rule 336.1201 (Permit-to-Install)	Peters Indoor Range and Gun Shop, Inc. (Peters) installed and operated since 1973 the gun shooting range.
^β The range was installed in 1973 and continuously operated since then. The range has a capacity for ten (10) customers to shoot simultaneously. The range is equipped with five (5) intake (fresh) air filters for customer/worker comfort, health and safety. However, lead (Pb) laden exhaust air is discharged without any filters at the roof. Generally, ammunition is lead-based, which AQD confirmed. The range is not exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285 (cc) which requires HEPA filters, preferably HEPA class H14/U15 or better, for exhaust gases from shooting range. If confirmed by MDEQ-RRD, Peters will be responsible for clean-up of lead (Pb), a known neurotoxin, contamination.		

During this inspection, it was noted that Peters' had installed and/or commenced operation of an unpermitted shooting range with lead-based ammunition at this facility. The AQD staff advised Peters' on April 28, 2016, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the Indoor Shooting Range process equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

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 and submit a written response to this Violation Notice by May 26, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Peters' 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 cited above and for the cooperation that was extended to me during my inspection of Peters'. If you have any questions regarding the or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Iranna Konanahalli

Air Quality Division
Konanahalli@michigan.gov or 586-753-3741

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ
Mr. Paul Owens, DEQ
Ms. Cheryl Wilson, DEQ

NAME Iranna Konanahalli DATE 05/23/2016 SUPERVISOR CTE