

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P070668463

FACILITY: Peters Indoor Range and Gun Shop, Inc.		SRN / ID: P0706
LOCATION: 28631 Gratiot Ave., ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Robert Peters , President & Owner		ACTIVITY DATE: 07/12/2023
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2023 complaint investigation and a level-2 self-initiated, unscheduled (but because of complaints to US EPA and EGLE), 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.		
RESOLVED COMPLAINTS:		

Peters Indoor Range and Gun Shop, Inc. (P0706)
28631 Gratiot Ave.
Roseville, Michigan 48066-4212

SRN reassign: U-50-16-0439 is consolidated into **SRN P0706**

Contact:

1. **Mr. Robert Peters** (Phone: 586-773-7515; Fax: 586-773-6688), Owner

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. Subsequently, Peters installed pleated HEPA filters and VN was resolved.

FY 2023 Complaint – lead (Pb) issue.

1. **C-23-01621**, via US EPA (Received: 07/05/2023; Incident: 06/30/2023; Complainant: Anonymous; Issue: Lead (Pb) from gun range.

Complaint investigation: July 12, 2023.

On **July 12, 2023**, I conducted a **FY 2023 complaint investigation** and a level-2 self-initiated, unscheduled (but because of complaints to US EPA and EGLE), **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 Environment, Great Lakes and Energy, Air Quality Division (EGLE-AQD) administrative rules.

On July 07, 2023, Environment, Great Lakes and Energy, Air Quality Division (EGLE-AQD) received the above complaint (C-23-01621) from a confidential / anonymous complainant,

regarding lead fall-out attributable to Peters Indoor and Range Gun Shop because filtration system (6 pleated filters) for the gun range has not been maintained properly.

During the FY 2023 complaint investigation and the inspection on July 07, 2023, **Robert Peters**, Owner, assisted me.

During the FY 2016, inspection, AQD confirmed that Peters Indoor Range and Gun Shop, Inc. ("Peters") was emitting lead (Pb) laden exhaust air from roof vent without any filtration since 1973. Pb dust is emitted when gun shooting occurs at the range. The gun shooting range is equipped with five (5) intake air filters for customer / worker comfort, safety and health. Intake air (filtered) together with slightly higher volume exhaust air makes sure lead (Pb) dust moves away from the customers breathing zone. The range can accommodate maximum ten (10) customers / shooters at any given time. The 2016 Rule 336.1201 (Permit-to-Install) Violation Notice was resolved upon installing pleated HEPA filters (6 pleated filters) as it satisfied Rule 336.1285(cc).

Before 2016, because the shooting range was not equipped with HEPA filters for filtration of lead (Pb) laden exhaust gases, the range was **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.

The pleated HEPA filter system, installed in 2016, consists of six (6) pleated filters. The pleated design increases the filtration surface area and consequently reduces the pressure drop (or reduces the resistance to exhaust air flow). There is no pulse-jet air to clean the filters periodically (say once a minute). Instead, like home furnace filters, the filters are periodically replaced; one such replacement occurred in June 2023. The shooting business is down since March 2020 due to COVID-19 pandemic.

About 2017, via the ventilation system, three (3) attempted robberies / thefts occurred; only one (1) of three (3) attempts was successful. Police did not show up on time. As a result of these attempts, Magneheilic pressure instrument is not functioning. On July 27, 2023, I talked to Robert Peters when he agreed to repair the pressure differential (ΔP) monitoring system within 90 days.

Lead (malleable metal, density = 11.34 grams per cubic centimeter [g/cm^3] and Melting Point = 621 °F) is neurotoxin that accumulates in soft tissue, brain and bones causing damage to nervous system.

Conclusion

The complaint (C-23-01621) is resolved. Peters will be in compliance upon repairing Pressure Difunctional Monitor (Mangneheilic).

FYI: May 05, 2016, VN

NAME J. S. Marshall

DATE August 4, 2023 SUPERVISOR Joyce