



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

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 Mr. 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.

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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

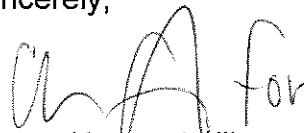
Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation 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 violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 violation cited above and for the cooperation that was extended to me during my inspection of Peters'. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Handwritten signature of Iranna Konanahalli in black ink, appearing to read "Iranna Konanahalli for".

Iranna Konanahalli
Senior Environmental Engineer
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