



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

October 21, 2016

Mr. Rick Cornette  
RC Fillmore's Sandblasting and Special Coatings  
3390 Ravenswood Road  
Port Huron Township, Michigan 48040

SRN: P0756, Saint Clair County

Dear Mr. Cornette:

**VIOLATION NOTICE**

On October 11, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of RC Fillmore's Sandblasting and Special Coatings located at 3390 Ravenswood Road, Port Huron Township, Michigan. The purpose of this inspection was to determine RC Fillmore's 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 to investigate a recent complaint which we received on October 10, 2016, regarding sand blasting attributed to RC Fillmore's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Sandblasting of parts prior to painting in an outdoor enclosure.	R 336.1201(1) Operating without a permit	RC Fillmore did not properly control fugitive emissions from its sandblasting operation; therefore, the operation could not meet the permit exemption R 336.185(l)(vi). The facility is either required to completely enclose its process and only release dust to the inside environment or to control its emissions with a properly designed filtration system in order to apply the exemption rule.
Painting outdoors with a spray gun.	R 336.1201(1) Operating without a permit	RC Fillmore is operating a paint spray gun outside. Overspray was visible on the ground. The equipment was not controlled by a properly designed particulate control system. Also RC Fillmore was unable to indicate with records that the paints used per month does not exceed 200 gallons per month minus water; as a result, the painting process could not meet the permit exemption R 336.1287.

During this inspection, it was noted that RC Fillmore had installed and/or commenced operation of an unpermitted process/equipment at this facility. The AQD staff advised RC Fillmore on October 10, 2016 that this is a violation of Act 451, Rule 201.

RC Fillmore can achieve compliance with Act 451, Rule 201 by doing one of the following:

- The facility can demonstrate that the cited processes can meet the permit exemptions Rules, R 336.1285(l)(vi) and R 336.1287.

R 336.1285(l)(vi) in part states:

Rule 285. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

. . . (l) The following equipment and any exhaust system or collector exclusively serving the equipment: . . .

. . . (vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planning, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following: . . .

. . . (B) Equipment has emissions that are released only into the general in-plant environment.

(C) Equipment has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

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: . . .

. . . (b) A surface coating process that uses only hand-held aerosol spray cans, including the puncturing and disposing of the spray cans.

(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 properly installed and operating particulate control system.

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

OR

- The company applies for a permit for the processes. A program for compliance shall include a completed PTI application for the sandblasting and painting process equipment. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml](http://www.deq.state.mi.us/aps/nsr_information.shtml)

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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.

OR

The facility can cease its operations and indicate that they are no longer operating the equipment at the current address.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 11, 2016 (which coincides with 21 calendar days from the date of this letter). 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 RC Fillmore 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 violations cited above and for the cooperation that was extended to me during my inspection of RC Fillmore. 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,



Tyler Salamasick  
Environmental Quality Analyst  
Air Quality Division  
586-753-3731

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Joyce Zhu, DEQ