

EGLE, AQD, Kalamazoo District  
7953 Adobe Road  
Kalamazoo, MI 49009



Attn: Cody Yazzie & Jenine Camilleri

The purpose of this letter is to respond to the Violation Notice Dated October 9, 2019 and outline the steps We (BlasTek) intend to take to move our operation into compliance.

Per Violation Notice there are three (3) violations:

- 1 Blasting operation “on the outside of the general in-plant environment. The location does have a roof over the area but does include three walls that are open to the outside environment.”
- 2 Another blasting operation in separate building that is “enclosed on all sides but one.”
- 3 “The facility does have two trailer bays in which they will use as coating lines. The facility was not able to produce monthly usage records showing that they are coating less than 200 gallons, as applied, minus water.”

### **History**

We moved into the facility at 122<sup>nd</sup> AVE approximately two years ago (Spring 2018). We rented the first year and then proceeded to purchase the building at the beginning of 2019. Originally our intentions were to use the facility as storage and staging for our field operations, but as our business grew, we received an increasing demand for blasting and painting services at the shop. With that we began blasting raw (non-coated) steel from our customers and periodically painting those steel pieces afterward.

### **Response**

Regarding violations (1) and (2), we do have two separate spaces on-site that we have used for blasting. The one described in citation (1) is one that we use primarily for blasting raw steel. The one described in citation (2) is used infrequently and for glass bead blasting stainless steel only. Regarding blast media, the Report notes silica fallout located on site – we would like to note that we have made a switch to using Black Beauty or similar products that do not contain free-silica.

Violation (3) pertains to coatings operations at the shop. At the time of the inspection there was a semi trailer in one of the semi bays that had been painted. However, the only time we have used the semi bays for painting is only for semi trailers and we only do 2-3 a year. The majority of coating work is performed in the back center room.

Our plan is to fully enclose the blast areas and outfit them with black max air fan and nylon fabric filter. We hope this will be sufficient for compliance until we can get a more permanent solution in place. In addition we are taking bids for building a separate building that can be used strictly for blasting; one that is fully enclosed and equipped with a more industrial dust collection method.

For painting compliance, we are applying for the permit this week (Applicability Criteria for Coating

collector we have onsite already designed for coating lines (AmTech). Before that project can begin, though, we need to first replace the circuit board that houses our 440v electrical panel. For this we have a cite plan together, a quote from Consumers Energy, and are working on finding an electrical contractor to run the conduit and switch the boards. We also understand that both dust collection systems will have to be installed in-line with permit criteria process.

This translates to a significant capital expenditure we will have to incur, but one we are willing to move forward with for the sake of growing our business in way that is safe for the workers and the environment. By the second week of November, 2019 we anticipate having more information on the various projects outlined in this letter and their schedule for completion.

Please contact me directly at any time if you have questions, and I also plan to keep Cody Yazzie informed with the entire process.

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