



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 19, 2019

Mr. Steve Phillips
Truck-Tech Refurbishing, Inc.
5900 East Highland Road
Howell, Michigan 48843

SRN/ID: U47110552, Livingston County

Dear Mr. Phillips:

VIOLATION NOTICE

On June 26th, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Truck-Tech Refurbishing, Inc., located at 5900 East Highland Road, Howell, Michigan. The purpose of this inspection was to determine Truck-Tech'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 May 15, 2019, regarding sand blasting attributed to Truck-Tech's operations.

During the inspection, staff observed the following :

Process Description	Rule/Permit Condition Violated	Comments
Sand blasting process	Rule 370	Failure to dispose of air contaminants in a manner to minimize contaminants to the outer air.
Surface coating process	Rule 910	Failure to maintain dry filter control.
Surface coating process	Rule 201	Failure to install and operate without having first obtained a permit to install.

-RULE 201 VIOLATIONS

During this inspection, it was noted that Truck-Tech had installed and commenced operation of unpermitted surface coating equipment at this facility. This is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the surface coating process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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.

AQD staff provided Truck-Tech with a copy of The Permit to Install Exemption Handbook, which includes Rule 287(2)(c). This rule exempts the following from the requirement to obtain a permit to install:

(c) A surface coating line if all of the following conditions are met: Page 69 Courtesy of www.michigan.gov/orr

(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 dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

-RULE 370: COLLECTED AIR CONTAMINANTS

On June 26, 2019, the AQD staff observed sandblasting process equipment while the used media was not collected, stored and disposed of in a manner consistent with good air pollution control practices.

This constitutes a violation of Rule 370 of the administrative rules promulgated under Act 451, which requires that the collection and disposal of air contaminants shall be performed in a manner to minimize the introduction of contaminants to the outer air.

-RULE 910: AIR CLEANING DEVICES

On June 26, 2019, the AQD staff observed operation of paint booth process equipment while the dry filter control was not maintained and operated in a manner consistent with good air pollution control practices.

Mr. Steve Phillips
Truck-Tech Refurbishing, Inc.
Page 3
July 19, 2019

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 9, 2019, (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.

Please also include with your response, Safety Data Sheets for all coatings used at the facility. If you choose to forego applying for a permit to install and wish to operate under Exemption Rule 287(2)(c) then please also include monthly coating use records for the paint booth to demonstrate that the coating usage is not more than 200 gallons, as applied, minus water.

Please submit the written response to EGLE, AQD, Lansing District, at 525 W. Allegan St., PO Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Truck-Tech 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. 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.

Additionally, EGLE staff have also identified additional activities on-site that fall under other statutes administered by other EGLE divisions:

1. The wetland on the northeast corner of your site is regulated and protected by Part 303, Wetlands Protection, of the NREPA. Permit 15-47-0009-P was issued in 2015 authorizing placement of fill in the wetland for construction of the building, parking lot, and storm water management system. However, it appears that wetland has potentially been filled beyond what was authorized in permit 15-47-0009-P and the site is therefore in violation of Part 303 and permit

Mr. Steve Phillips
Truck-Tech Refurbishing, Inc.
Page 4
July 19, 2019

15-47-0009-P. Contact Mr. Jeff Pierce, EGLE Water Resources Division, at 517-416-4297 or piercej2@michigan.gov in order to set up a site inspection and discuss corrective actions to bring the site into compliance with Part 303.

2. It appears that Truck-Tech, located at 5900 East Highland Road, Howell, Michigan, may require coverage under the National Pollutant Discharge Elimination System (NPDES) Industrial Storm Water General Permit. Truck-Tech is a heavy equipment refurbishing center. The NPDES permit coverage is required for facilities if the following three conditions apply:
 - The facility's Standard Industrial Classification (SIC) code is regulated.
 - The facility has exposure of industrial related materials.
 - The facility has a point-source discharge to surface waters of the state.The facility shall contact Mr. Brian Zuber at ZuberB@michigan.gov; or 517-388-0267 for additional information. Also, information on the NPDES Industrial Storm Water Program can be found at the following website:
https://www.michigan.gov/egle/0,9429,7-135-3313_71618_3682_3716-24018--,00.html. Documents to assist the facility in determining if their SIC code is regulated can be found under the header "Storm Water Program Permit Information".

Sincerely,



Samantha Braman
Environmental Quality Analyst
Air Quality Division
517-282-1373

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE