



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

July 16, 2015

Ms. Donna Spytma
Federal Mogul Corporation
200 South Maple Street
Sparta, Michigan 49345

SRN: B1709, Kent County

Dear Ms. Spytma:

VIOLATION NOTICE

On July 15, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Federal Mogul Corporation located at 200 South Maple Street, Sparta, Michigan. The purpose of this inspection was to determine Federal Mogul Corporation'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 administrative rules; the conditions of Permit to Install (PTI) number 391-07; and to investigate recent complaints which we received regarding fallout attributed to Federal Mogul Corporation's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFURNACES	PTI No. 391-07, Special Condition 1.5 Rule 910	Failure to properly capture and control emissions
FGFACILITY	Rule 901	Particulate fallout

On July 15, 2015, AQD staff observed operation of the electric induction furnaces (EUFURNACES). During this time, staff observed that a majority of the emissions from the furnaces were being drawn through three powered roof vents as opposed to the capture system associated with the 50,000 cfm Dustar baghouse, which is required by PTI No. 391-07 to control emissions from the furnaces. As discussed during the inspection, the roof vents have recently been replaced and vent emissions from the furnaces uncontrolled to the outside atmosphere.

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

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Additionally, during the inspection fallout was observed on a majority of the employee vehicles located in the parking lot adjacent to the facility. The observed fallout was consistent with that described in the seven separate complaints received by the AQD since June 18, 2015. The observed fallout constitutes a violation of Rule 901.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 6, 2015 (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 Federal Mogul Corporation 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 Federal Mogul Corporation. 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,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-0266

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ