



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

August 11, 2015

Mr. Richard Payne III, Plant Engineer
Ervin Amasteel Division
915 Tabor Street
Adrian, Michigan 49221

SRN: B1754, Lenawee County

Dear Mr. Payne:

VIOLATION NOTICE

On June 8, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ervin Amasteel Division located at 915 Tabor Street, Adrian, Michigan. The purpose of this inspection was to determine Ervin Amasteel'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; and the conditions of Renewable Operating Permit (ROP) Number MI-ROP-B1754-2013.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU 0004 Shot Forming Area	ROP No. MI-ROP-B1754-2013, EU 0004	Operation of the emission unit without baghouse control from November 14, 2014 through January 27, 2015.
	ROP No. MI-ROP-B1754-2013, EU 0004, Special Condition VI.1 and Appendix 4	Failure to take action in accordance with Appendix 4 in response to pressure drop readings outside the normal operating ranges.
EU 0007 Grit Production	ROP No. MI-ROP-B1754-2013, EU 0007, Appendix 4	Failure to take action in accordance with Appendix 4 in response to pressure drop readings outside the normal operating ranges.
FG 0005 Shot Processing	ROP No. MI-ROP-B1754-2013, EU 0005, Special Condition VI.1 and Appendix 4	Failure to take action in accordance with Appendix 4 in response to pressure drop readings outside the normal operating ranges.

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During this inspection it was determined that Ervin Amasteel continued to operate EU 0004 from November 14, 2014 through January 27, 2015 without control from the 80,000 cfm baghouse after the baghouse impeller broke. Compliance with the particulate matter emission limits for EU 0004 requires proper baghouse control.

Additionally, review of the provided baghouse monitoring records show that there were deviations from the established normal operating parameters documented on two occasions for EU 0004 (records reviewed: January 2014 – June 2015), a majority of the readings for EU 0007 (records reviewed: April 2015 – June 2015) and on six occasions for FG 0005 (records reviewed: May 2015 – June 2015). Appendix 4 of the ROP specifies the required actions to be taken when there are deviations from the normal pressure drop ranges. Review of the baghouse records do not document that these response actions occurred.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 1, 2015. 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 Ervin Amasteel 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 Ervin Amasteel. 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/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Scott Miller, DEQ
Mr. Michael Gabor, DEQ