



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

August 11, 2015

Mr. Michael Peterson
Huron Casting, Inc.
7050 Hartley Street
Pigeon, Michigan 48755

SRN: B7013, Huron County

Dear Mr. Peterson:

VIOLATION NOTICE

On June 24, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Huron Casting, Inc. and Blue Diamond Steel Casting, Inc. (Huron Casting/Blue Diamond) located at 7050 Hartlet Street, Pigeon, Michigan. The purpose of this inspection was to determine Huron Casting/Blue Diamond'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 Permit to Install (PTI) numbers 207-02E and 129-08C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Stationary Source (Huron Casting/Blue Diamond)	Federal Prevention of Signification Deterioration (PSD) 40 CFR 52.21	Failure to obtain a PSD permit prior to construction and operation of Blue Diamond Steel Casting
	Title V Renewable Operating Permit (ROP) Program Rule 336.1210	Failure to obtain and maintain a ROP
Blue Diamond Steel Casting		
FGFACILITY	PTI No. 129-08C, Special Condition (SC) VI.2; 40 CFR 63.10900(b)	Failure to submit an initial notification
	PTI No. 129-08C, SC IX.1; 40 CFR 63.10899(d)	Failure to submit notification of facility classification
	PTI No. 129-08C, SC VI.5; 40 CFR 63.10900(b)	Failure to submit Notification of Compliance Status Report

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY (cont.)	PTI No. 129-08C, SC IX.1; 40 CFR 63.10899(c)	Failure to submit semiannual certifications for January – June 2011, January – June 2012 July – December 2014
	PTI No. 129-08C, SC IX.1; 40 CFR 63.10898(i)	Failure to conduct most recently required fugitive opacity testing
EU-NBCALCINER	PTI No. 129-08C, SC VI.2	Failure to maintain temperature records
EU-NBFURNACE	PTI No. 129-08C, SC IV.1; 40 CFR 63.10895(b)	Failure to install, maintain and operate a capture system that meets acceptable engineering standards
	PTI No. 129-08C, SC V.1; 40 CFR 63.10898	Failure to conduct an acceptable initial performance test due inadequate capture
Electric Arc Ladle Furnace	Rule 336.1201	Failure to obtain a Permit to Install prior to starting installation
Vacuum Degassing Unit	Rule 336.1201	Failure to obtain a Permit to Install prior to starting installation
Huron Casting		
FGFACILITY	PTI No. 129-08C, SC IX.1; 40 CFR 63.10899(c)	Failure to submit semiannual certification for July – December 2014
	PTI No. 129-08C, SC IX.1; 40 CFR 63.10898(i)	Failure to conduct most recently required fugitive opacity testing
EUPOURINGA	40 CFR Part 63, Subpart ZZZZZ 63.10895(b)	Failure to install, maintain and operate a capture system that meets acceptable engineering standards.
	40 CFR Part 63 Subpart ZZZZZ 63.10898	Failure to conduct an acceptable initial performance test due to inadequate capture

Process Description	Rule/Permit Condition Violated	Comments
EUPOURINGB	40 CFR Part 63 Subpart ZZZZZ 63.10895(b)	Failure to install, maintain and operate a capture system that meets acceptable engineering standards
	40 CFR Part 63 Subpart ZZZZZ 63.10898	Failure to conduct an acceptable initial performance test due to inadequate capture
FG-POUR	PTI No. 129-08C, SC VIII.1	Discharge of emissions directly to the atmosphere

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.

Based upon the permitted steel throughput, Huron Casting/Blue Diamond has the potential to emit more than 100 tons of carbon monoxide and therefore is required to obtain a Prevention of Significant Deterioration (PSD) permit under 40 CFR 52.21 of the Federal Clean Air Act. As a result of these findings, Huron Casting/Blue Diamond is in violation of the federal PSD regulations under 40 CFR 52 by failing to obtain a PSD permit prior to commencing construction and operation of Blue Diamond Steel Casting. In addition, since the facility is classified as a major source, it is subject to the provisions of the federal Title V Renewable Operating Permit Program and the requirements of Michigan Air Pollution Control, Part 55 of Act 451 of 1994, R 336.1210.

During this inspection, it was also noted that Blue Diamond Steel Casting had begun installation of an unpermitted electric arc ladle furnace and a vacuum degassing unit at this facility. 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.

A program for compliance may include a completed PTI application for the electric arc ladle furnace and vacuum degassing unit. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

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If Huron Casting/Blue Diamond 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 Huron Casting/Blue Diamond. 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,

A handwritten signature in black ink, appearing to read "Eric Grinstern", with a long horizontal flourish extending to the right.

Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-2066

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Hare, DEQ
Ms. Sydney Bruestle, DEQ