

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

August 6, 2018

Mr. Leroy Wurst, President Huron Casting, Inc 7050 Hartley Street Pigeon, Michigan 48755

Mr. Daryl Mendrick Huron Casting, Inc 7050 Hartley Street Pigeon, Michigan 48755

SRN: B7013, Huron County

Dear Mr. Wurst and Mr. Mendrick:

VIOLATION NOTICE

On May 22 and 23, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Huron Casting Inc and Blue Diamond Steel Casting, LLC located at 7050 Hartley Street and 125 Sturm Road, respectively, Pigeon, Michigan. The purpose of this inspection was to determine Huron Casting Inc and Blue Diamond Steel Casting, LLC'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 the conditions of Renewable Operating Permit (ROP) number MI-ROP-B7013-2018 and Consent Order AQD number 4-17.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Source-Wide Conditions	SC 1.7	Monthly average for lb/ton melt for CO over the emission limit
Source-Wide Conditions	SC VI.4	HAPs emissions did not include all HAPs for facility. Missing multiple constituents
FG-MOLDLINE	SC VI.2	12-month rolling records not being kept for binder usage
FG-BDSV02	SC VI.3	12-month rolling records not being kept for binder usage

During this inspection, Huron Casting Inc and Blue Diamond Steel Casting, LLC were unable to produce material usage records for binder used in FG-MOLDLINE and FG-BDSV02. Further, HAPs emission calculations did not include all HAPs for the facility.

These are violations of the recordkeeping and emission limitations specified in Special Conditions FG-MOLDLINE, VI.2 and FG-BDSV02, VI.3 and Source-Wide condition VI.4 of ROP number MI-ROP-B7013-2018.

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Source-Wide conditions limit the facility to 4.8 lb/ton melt for CO. During this inspection, Huron Casting Inc and Blue Diamond Steel Casting, LLC reported carbon monoxide (CO) emissions at 5.11 lb/ton melt. This is a violation of the emission limitations specified in Source-Wide condition 1.7 of ROP number MI-ROP-B7013-2018.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 27, 2018 (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 submit the written response to the DEQ, AQD, Saginaw Bay District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48631 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Huron Casting Inc and Blue Diamond Steel Casting, LLC 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 Inc and Blue Diamond Steel Casting, LLC. 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,

Gina L. McCann Senior Environmental Quality Analyst Air Quality Division 989-439-2282

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ Mr. Craig Fitzner, DEQ Mr. Christopher Ethridge, DEQ Ms. Jenine Camilleri, DEQ Mr. Chris Hare, DEQ