



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 10, 2014

Mr. Dennis C. Palmiter
President
Sun Steel Treating, Inc.
550 Mill Street
P.O. Box 759
South Lyon, Michigan 48178-0759

SRN: B8851, Oakland (63) County

Dear Mr. Palmiter:

VIOLATION NOTICE

On March 03, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Sun Steel Treating, Inc. ("Sun") located at 550 Mill Street, South Lyon, Michigan. The purpose of this inspection was to determine Sun'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) number 811-89.

During the March 07, 2014 inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Heat treating process including molten salt baths	Permit to Install No. 811-89, Special Condition Nos.15 & 17	The molten salt bath capture system was not operating properly resulting in visible emissions due to inadequate capture of particulate emissions from the molten salt bath (Bath # 13).
Heat treating process including molten salt baths	Rule 336.1910	Plugged bags.

On March 07, 2014, AQD staff observed operation of the heat treating process including the molten salt baths while the baghouse (the cartridge filters were replaced in January 2014) system was malfunctioning as a result of bag plugging. The baghouse and cartridge filter systems operate in parallel. The capture system was malfunctioning due to insufficient air flow through the plugged bags (baghouse).

This constitutes a violation of Act 451, Rule 336.1910, 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.

A push-pull ventilation system works well for a molten salt bath. Pursuant to the American Conference of Governmental Industrial Hygienists, for proper operation of push-pull systems, pull flow should be approximately two times the push flow. In addition, the flows should produce adequate capture velocities and no other fan or air draft should be interfering with the push-pull ventilation system.

Please initiate actions necessary to correct the cited violation and **submit a written response to this Violation Notice by March 31, 2014** (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Sun 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 Sun Steel Treating, Inc.. 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,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-753-3741 or konanahalli@michigan.gov

ISK/DAC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ