



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



DAN WYANT  
DIRECTOR

August 31, 2015

Mr. Mark Maatman  
Production Manager  
Gerdau Special Steel North America  
1801 Bassett Street  
Lansing, MI 48915

SRN: N0478, Ingham County

Dear Mr. Maatman:

**VIOLATION NOTICE**

On June 23, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Gerdau Special Steel North America's Lansing Bassett Facility, located at 1801 Bassett Street, Lansing. The purpose of this inspection was to determine Gerdau Special Steel North America'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 473-97A and 1270-91.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOAT, a steel parts pickling and phosphate line	PTI No. 473-97A, Special Condition No. 1.3	Scrubber pressure drop gauge set to a lower range than allowed by the PTI.
EUCOAT, a steel parts pickling and phosphate line	Rule 910	Air pollution control device not maintained in an acceptable manner.

On June 23, the AQD staff observed operation of the scrubber while the pressure drop gauge was not being maintained in an acceptable manner. The low end of the scrubber's pressure drop range was set to 0.0 inches, water gauge, whereas the low end of the pressure drop range allowed by the permit is 0.5 inches, water gauge. This was corrected immediately, while AQD staff was present. The facility was in compliance, at the time AQD staff left the site. However, there was a period of time in the past, when the facility was in violation of PTI Number 473-97A, Special Condition Number 1.3, which states:

"The permittee shall not operate the EUCOAT wet scrubber unless a gauge, which measures the pressure drop across the scrubber and sounds an alarm when the pressure drop is below 0.5 inches or exceeds 1.5 inches water, is installed, maintained, and operated in a satisfactory manner."


Additionally, there was a period of time in the past, when there was a violation of Act 451, Rule 910, 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.

Please submit a written response to this Violation Notice by September 14, 2015. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; 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 Gerdau Special Steel North America 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 Gerdau Special Steel North America's Lansing Bassett Facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Daniel A. McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-284-6638

DAM:TG

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