

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

GRAND RAPIDS DISTRICT OFFICE



SRN: N1019, Wayne County

September 15, 2022

Scott Tynan, President Northfield Manufacturing, Inc. 38549 Webb Drive Westland, Michigan 48185

Dear Scott Tynan:

VIOLATION NOTICE

On August 2, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Northfield Manufacturing, Inc. (Northfield) located at 38549 Webb Drive, Westland, Michigan. The purpose of this inspection was to determine Northfield'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 Wayne County Air Permits C-6714 through C-6719.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
(2) Phenolic Urethane Sand Mixers	Rule 201 (R 336.1201)	Installation and operation of two (2) unpermitted sand mixers uncontrolled.
Cold Box Core Operation	Rule 201 (R 336.1201)	Installation and operation of an unpermitted cold box core making operation utilizing N, N-Dimethylisopropylamine.
Thermal Sand Reclamation	Rule 201 (R 336.1201)	Installation and operation of an unpermitted thermal sand reclamation unit.
	Rule 910 (R 336.1901)	Failure to operate the baghouse controlling emissions in a satisfactory manner based on the observation of visible emissions during the inspection.

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Process Description	Rule/Permit Condition Violated	Comments
(2) Electric Induction Melting Furnaces (3,000 lb.& 2,000 lb.)	Rule 201 (R 336.1201)	Installation and operation of two (2) unpermitted electric induction melting furnaces.
Iron and Steel Foundry	40 CFR Part 63, Subpart ZZZZZ, Iron and Steel Foundries Area Sources NESHAP (63.10890, 63.10899(c))	Failure to submit Initial Notification, Notification of Size, Notification of Metallic Scrap Management and Binder Formulation, Notification of Compliance with Mercury Requirements.
		Failure to submit semiannual compliance reports for the time period of 2008 through July 1, 2022.

During this inspection, it was determined that Northfield had installed and commenced operation of unpermitted equipment at this facility. This is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the above listed process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 6, 2022 (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.

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Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Northfield 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 Northfield. 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

Cric Grinstern

616-204-1958

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
April Wendling, EGLE