



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GAYLORD FIELD OFFICE



C. HEIDI GREETHER  
DIRECTOR

October 2, 2017

Mr. Tony McCarty  
ZD Metal Products, Inc.  
1950 Fochtman Industrial Drive  
Petoskey, Michigan 49770

SRN: N3887, Emmet County

Dear Mr. McCarty:

**VIOLATION NOTICE**

On September 20, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of ZD Metal Products, Inc. located at 1950 Fochtman Industrial Drive, Petoskey, Michigan. The purpose of this inspection was to determine ZD Metal Products, Inc.'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 Permit to Install (PTI) number 232-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-GDC and FGFURNACE Tables, SV-GDC and SV-MELT2 respectively (during inspection determined these are the same stack).	EU-GDC Table VIII.1 SV-GDC and FGFURNACE; Table VIII.2 SV-MELT2; require the exhaust gases from the stacks to be discharged unobstructed vertically upwards to ambient air.	The stack referred to as SV-GDC/SV-MELT2 has a rain guard above the exit point of the stack, therefore does not discharge unobstructed vertically upwards.
FGFURNACE Table, SV-MELT1	FGFURNACE Table VIII.1 SV-MELT1 requires the exhaust gases from the stacks to be discharged unobstructed vertically upwards to ambient air.	The stack referred to as SV-MELT1 has a rain guard above the exit point of the stack, therefore does not discharge unobstructed vertically upwards.

In addition, during this inspection, ZD Metal Products, Inc. was unable to produce records. This is a violation of the recordkeeping requirements and emission limitations specified in several Special Conditions of PTI number 232-15, as noted below:

EU-GDC Table:

VI.2 Requires the permittee to keep monthly records indicating if any flux was used in any holding furnace in EU-GDC.

FGFURNACE Table:

VI.1 Requires the permittee to keep daily records of flux usage in pounds, aluminum feed in tons, and hours of operation for FGFURNACE.

VI.2 Requires the permittee to keep monthly and 12-month rolling time period records of the flux usage in pounds and the aluminum feed in tons for FGFURNACE.

VI. 4 Requires the permittee to perform daily calculations of the average emissions in pounds per hour of PM, PM10, and PM2.5.

VI. 5 Requires the permittee to perform monthly calculations of annual emissions of PM, PM10, PM2.5, and nickel.

Enclosed is a copy of PTI number 232-15, cited above.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 23, 2017 (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.

If ZD Metal Products, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate 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 ZD Metal Products, 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,



Becky Radulski  
Senior Environmental Engineer  
Air Quality Division  
989-705-3404

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Shane Nixon, DEQ