



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

November 1, 2019

Mr. Dean Lynn, General Manager  
Metal Technologies - Ravenna Ductile Iron  
3800 Adams Road  
Ravenna, Michigan 49451

SRN: N5866, Muskegon County

Dear Mr. Lynn:

**VIOLATION NOTICE**

On October 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a compliance test report for Metal Technologies - Ravenna Ductile Iron located at 3800 Adams Road, Ravenna, Michigan. The test report documented the results of testing conducted on September 10-12 and October 7 and 8, 2019, as required by Renewable Operating Permit No. MI-ROP-N5866-2019 and 40 CFR Part 63, Subpart EEEEE.

The following violation was identified in the report:

Process Description	Rule/Permit Condition Violated	Comments
FG-SAND (Pouring, Cooling, Shakeout and Sand System)	ROP No. MI-ROP-N5866-2019, FG-SAND, Special Condition (SC) I.2	Exceedance of the pound per hour limit for particulate matter (PM).

On September 10-12, 2019, a stack test was conducted which indicated that emissions from the FG-SAND exceeded the allowable emission rate specified in FG-SAND, SC I.2 of ROP No. MI-ROP-N5866-2019. The allowed maximum emission rate of particulate matter is 6.0 pounds particulate per hour. However, actual emissions were reported to be 11.4 pounds of particulate per hour.

Metal Technologies – Ravenna Ductile Iron conducted retesting on October 7 and 8, 2019 and provided the results on October 25, 2019. The results of the retesting demonstrated compliance (4.67 lb./hr.) with the PM limit for FG-SAND. Additionally, Metal Technologies – Ravenna Ductile Iron provided an explanation of the cause, duration and corrective actions taken to resolve and prevent a reoccurrence of the emission limit exceedance. Therefore, no additional response is required.

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If Metal Technologies - Ravenna Ductile Iron 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 violation cited above and for the cooperation that was extended to me during my inspection of Metal Technologies - Ravenna Ductile Iron. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Grinstern", with a long horizontal flourish extending to the right.

Eric Grinstern  
Environmental Quality Specialist  
Air Quality Division  
616-558-0616

cc: Mr. Dan Plant, Metal Technologies  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi G. Hollenbach, EGLE