



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

January 23, 2024

Robert McMahon Jr., President & CEO
Great Lakes Casting LLC
800 North Washington Avenue
Ludington, Michigan 49431

SRN: A3934, Mason County

Dear Robert McMahon Jr.:

VIOLATION NOTICE

On November 29, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Great Lakes Casting LLC located at 800 North Washington Avenue, Ludington, Michigan. The purpose of this inspection was to determine Great Lakes Casting'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 Renewable Operating Permit (ROP) number MI-ROP-A3934-2015.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Onsite new Diesel Engine	Rule 336.1201	Facility confirmed installation and operation of a new engine during inspection, and AQD has not received documentation on this new diesel engine.
Modification of emission unit EUHUNTERSAND	Rule 336.1201	During the inspection, AQD was informed EUHUNTERDUSTAR no longer exists because the exhaust has been re-routed to EUHUNTERSAND and associated CSI Baghouse.
Semi-Annual Compliance Reporting	R 336.1213(3)(c)(i), and 40 CFR 63.10899(c)	AQD did not receive the semi-annual compliance report from January 1, 2023 to June 30, 2023, in accordance for the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries in Area Sources in 40 CFR Part 63, Subpart ZZZZZ.

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A program for compliance shall include completed PTI applications for the newly installed engine and the modification of emission unit EUHUNTERSAND. An application form is available by request, or at the following website: www.michigan.gov/air and click on "Permits". A completed permit application shall be submitted to the Permit Section in Lansing, Michigan.

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.

At this time, the AQD has not received Great Lakes Casting, LLC semi-annual compliance report for January 1 - June 30, in 2023, which was required to be postmarked by the AQD district office by September 15, 2023 in accordance to the federal NESHAP for Iron and Steel Foundries in Area Sources in 40 CFR Part 63, Subpart ZZZZZ. This constitutes a violation of Condition No. 23 in Section A and Special Condition No. 5 under Source-wide Conditions in Section B in ROP Number MI-ROP-A3934-2015.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 14, 2024 (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.

Please submit the written response to Caryn Owens at EGLE, AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 or OwensC1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Great Lakes Casting LLC 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Great Lakes Casting, LLC. 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,



Caryn Owens
Senior Environmental Engineer
Air Quality Division
231-878-6688

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Shane Nixon, EGLE