



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 9, 2019

Mr. Tyler Hill
AAM-IMMF (Grede LLC)
801 South Carpenter Avenue
Kingsford, Michigan 49802-5594

SRN: B1577, Dickinson County

Dear Mr. Hill:

VIOLATION NOTICE

On June 26, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a testing report for the AAM-Iron Mountain Manufacturing Facility (IMMF), also known as Grede LCC ("Grede") located at 801 South Carpenter Avenue, Kingsford, Michigan. This testing is required by Renewable Operating Permit Number MI-ROP-B1577-2014a and 40 CFR, Part 63, Subpart EEEEE. Testing was performed April 16-18, 2019 and April 23-25, 2019.

Review of the results of this testing demonstrate that actual emissions of carbon monoxide (CO) from EU-P009 CUPOLA were >142.2 lb/hr and >2024.9 mg/scm. The conditions of ROP No. MI-ROP-B1577-2014a limit emissions of CO from EU-P009 CUPOLA to 21.0 lb/hr and 250.0 mg/scm.

Additionally, the results of the testing demonstrate that actual emissions of particulate matter 10 micrometers and smaller (PM10) from EU-P009 CUPOLA are 6.11 lb/hr. The conditions of ROP No. MI-ROP-B1577-2014a limit emissions of PM10 from EU-P009 CUPOLA to 1.30 lb/hr.

Results of the testing for sulfur dioxide (SO₂) for EU-P009 CUPOLA were invalid because the SO₂ analyzer did not pass calibrations. The conditions of ROP No. MI-ROP-B1577-2014a limit emissions of SO₂ from EU-P009 CUPOLA to 13.8 lb/hr and 170 mg/scm.

Results of the testing for PM for EU-P016 MAIN PLANT POURING AND COOLING and EU-P036 MODULE POURING AND COOLING were invalid for the following stacks because they failed the minimum straight run distances and/or cyclonic flow requirements of EPA Method 1:

	EU-P016 MAIN PLANT POURING AND COOLING	EU-P036 MODULE POURING AND COOLING
Stack ID	324176	334116
	324188	334176
	324196	
	324204	
	324484	
	324632	
	324662	
	324678	
	324682	
	324848	

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 30, 2019 (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 recurrence.

Please submit the written response to EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Grede 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. 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,



Joseph Scanlan
Environmental Quality Analyst
Air Quality Division
906-458-6405

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Ed Lancaster, EGLE