



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 19, 2021

VIA E-MAIL AND U.S. MAIL

Mr. Tyler Hill
Grede LLC - Iron Mountain
801 South Carpenter Avenue
Kingsford, Michigan 49802

SRN: B1577, Dickinson County

Dear Mr. Hill:

VIOLATION NOTICE

On December 15-17, 2020, a stack test was conducted at Grede LLC - Iron Mountain (Grede) located at 801 South Carpenter Avenue, Kingsford, Michigan. The purpose of the stack test was to determine Grede'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) # MI-ROP-B1577-2020; Consent Order AQD # 2021-01.

Test results provided the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|-------------------------|--|--|
| Cupola (EU-P009 CUPOLA) | R 336.1331, Special Condition I.5 under EU-P009 CUPOLA of MI-ROP-B1577-2020, Paragraph 10.A of AQD # 2021-01 | The average test result indicates PM10 emissions from the Cupola to be 2.50 pounds per hour. |

The stack test indicated emissions from the Cupola exceeded the allowable emission rate specified in Special Condition I.5 of ROP # MI-ROP-B1577-2020.

The allowed maximum emission rate of PM10 is 1.30 pounds per hour. However, the average test result emissions were recorded to be 2.50 pounds per hour.

This constitutes a violation of Rule 331, which prohibits emissions of particulate matter from any process or process equipment in excess of the maximum allowable emission rate listed in Table 31 or specified as a condition of an air use permit.

The cited Special Condition I.5 of ROP # MI-ROP-B1577-2020 is also enforceable as paragraph 10.A of Consent Order, AQD # 2021-01.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 12, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 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 violation cited above and for the cooperation that was extended to me during the stack test at Grede. 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,



Michael Conklin
Environmental Engineer
Air Quality Division
906-202-0013

cc: Mr. Tom White, Grede LLC
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Erin Moran, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Ed Lancaster, EGLE
Mr. Jeremy Howe, EGLE