



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 11, 2020

Mr. Dave Bent
Metal Technologies, Inc.
429 Fourth Street
Three Rivers, Michigan 49093

SRN: B2015, St. Joseph County

Dear Mr. Bent:

VIOLATION NOTICE

On March 12, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of Metal Technologies, Inc. (Facility) located at 429 Fourth Street, Three Rivers, Michigan. The purpose of this investigation was to evaluate a recent complaint that EGLE, AQD received on March 10 and March 11, 2020 regarding fallout damage to vehicles located at 642 Spring Street and 623 Spring Street, Three Rivers, Michigan that was attributed to foundry operations.

On March 10 and 11, 2020 EGLE, AQD staff received similar complaints stating that damage had been done to vehicles' finish at the addresses listed above. When staff arrived on site, complainant stated that the car was used but had been recently purchased, within the past year. Staff observed blue and orange specks that were described in the complaint. The blue and orange spots did not rub off and you could feel their indentation on the chrome. The complainant stated that she noticed the specks on Tuesday, the previous day. Staff took photos of the vehicle, two of the back windshield, one of the driver's side chrome window detailing, and one of the passenger side chrome window detailing. Staff also collected a fallout sample from the complainant's windshield.

A site visit was conducted as part of the complaint investigation to retrieve copies of visible emissions, pressure drop, and visolite records as well as obtain samples. Samples were taken from the North Fuller baghouse and the East/West Fuller baghouse. Additional records were emailed on March 12, 20, 23, and 24, 2020.

Records show that on February 25, 2020 abnormal visible emissions were recorded on both the East/West Fuller baghouse and North Fuller baghouse. The plant was shut down and baghouses checked. Visolite was used on East/West Fuller baghouse. No bad bags were found. Facility vacuumed cleaned the sides of the collectors. North Fuller was pulsed down to clear the bags and vacuumed cleaned the sides.

Records also showed that on February 27, 2020, abnormal visible emissions were again recorded on both the East/West Fuller baghouse and North Fuller baghouse. The

Mr, Dave Bent
 Metal Technologies, Inc.
 Page 2
 May 11, 2020

plant was shut down, visolite was used on both baghouses, and suspect bags were replaced.

Meteorological data from the area indicated that all day Tuesday February 25, 2020, through 6am Wednesday February 26, 2020 the wind was in the correct direction to blow toward the complainants' residences. Wind speed on that day gusted between 17 and 25 miles per hour.

Enclosed sample results concluded that all three samples taken on March 12, 2020 contained particles that were consistent with steel manufacturing. The sample taken from the car windshield was more similar to the particles found inside East/West Fuller baghouse than the North Fuller baghouse due to the presence of tubular, blue colored, rod-like particles with lines and texture on the surface which were only found in the East/West baghouse. The particles taken from the windshield were also smaller than those taken from either baghouse. This is consistent with the likelihood that the particles deposited on the windshield, which are, for the most part, smaller than the two possible sources, likely were carried in air.

Based on vehicle paint finish damage at the complainant's house, favorable meteorological conditions (wind direction and speed) within the time period identified by the complainant, sample analytical results, and identified baghouse control issues that coincides within the same time period, staff of EGLE, AQD is citing the following violations:

Process Description	Rule/Permit Condition Violated	Comments
FGEWFULLER - Casting accumulator, transfer, shot sand reclaim drum magnet, sand screens, and separators	Rule901(b)/MI-ROP-B2015-2019, Part A, General Condition No. 12.b Consent Order AQD No. 2018-20, Paragraph 9.A.	Particulate emissions attributed to the FGEWFULLER East West Fuller baghouse exhaust damaged the paint finish on the complainant's vehicles causing an unreasonable interference with the comfortable enjoyment of life and property.
FGEWFULLER - East West Fuller baghouse	Rule 910/MI-ROP-B2015-2019, Part A, General Condition No. 10 Consent Order AQD No. 2018-20, paragraph 9.B.	Air cleaning devices shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules. Plant

		records obtained by staff on March 12, 2020, March 20, 2020, and March 24, 2020 indicate that abnormal emissions were noted on February 25, 2020 and February 27, 2020 from the East West Fuller Baghouse stack and the North Fuller Baghouse during the daily visible emissions checks done by Facility. On February 25, 2020 the process was shut down immediately and plant personnel conducted a Visolite test on East West Fuller. No bags were found but the sides of the baghouse were vacuumed. The sides of North Fuller were pulsed down and vacuumed. On February 27, 2020 the plant was shut down and both baghouses were Visolited and suspect bags were replaced.
--	--	---

The cited Rule 901(b) and 910 in MI-ROP-B2015-2019 is also enforceable as paragraph 9.A and 9.B of Consent Order, AQD number 2018-20.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 1, 2020 (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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri,

Mr. Dave Bent
Metal Technologies, Inc.
Page 4
May 11, 2020

Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan
48909-7760.

If the Facility 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 and for the cooperation that was extended to me by the Facility during my complaint response investigation. 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,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
(269) 910-2109

enc: Sample results, Merit Laboratories, Inc.

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE