



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 20, 2022

Mary Kay Csire  
Linear Motion, LLC  
628 North Hamilton Street  
Saginaw, Michigan 48602

SRN: B3607, Saginaw County

Dear Mary Kay Csire:

**VIOLATION NOTICE**

On September 12, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Linear Motion, LLC located at 628 North Hamilton Street, Saginaw, Michigan. The purpose of this inspection was to determine Linear Motion’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 Permit to Install (PTI) number 383-08.

During the inspection, staff observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
EUWHLBLASTER	R 336.1911 Malfunction Abatement Plan (MAP) submitted January 15, 2021  PTI No. 383-08, SC III.1	Daily pressure differential not being recorded. Last logged January 2021.  When collector was turned on particulate “rained” down from loose piping.
EUPLATING	PTI No. 383-08 SC VI.2 requires daily records of once per day reading of both the pump discharge pressure and visual verification of return water flow to the holding tanks	Records not being kept when main operator on vacation. Multiple times not recorded.
EUPLATING	PTI No. 383-08 SC III.1.b MAP to measure liquid flowrate	Liquid flowrate below MAP, 42 gpm, from January 2022 through August 2022. Maintenance not performed until August

		2022. Annual measurement required. MAP needs update to include more frequent monitoring and corrective action needs to be taken.
FGHEATTREAT	PTI No. 383-08 SC VI.2 and VI.3 calculate PM emission rate for each calendar month, 12-month rolling	Records not maintained for PM 12-month rolling. Quench oil requires 12-month rolling. Currently recording monthly.
FGFACILITY	PTI No. 383-08 SC VI.2	Individual and Aggregate HAP emissions records not maintained.

During this inspection, Linear Motion LLC was unable to produce emission records.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition (SC) FGHEATTREAT VI.2 and VI.3, FGFACILITY VI.2 of PTI No. 383-08.

The conditions of PTI No. 383-08 require daily records of once per day readings of both the pump discharge pressure and visual verification of return water flow to the holding tanks in FGPLATING. The facility is not maintaining records when the main operator takes a vacation.

Additionally, the MAP states the liquid flowrate of the scrubbers shall be a minimum of 42 gpm and recorded once annually. Scrubbers 1 and 2 were below 42 gpm from January 2022 through August 2022. Scrubber 4 was below 42 gpm from March 2022 through August 2022. Maintenance records showed maintenance occurred in August 2022.

After the inspection November 9, 2020, AQD staff requested a MAP for EUWHLBLASTER. The MAP requires daily monitoring of the differential pressure. During the inspection we viewed one log from January 2021. The logs were not maintained past January 2021. Further, several staff could not identify where the pressure gauge was located.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 11, 2022 (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.

Mary Kay Csire  
Linear Motion, LLC  
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Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Linear Motion, 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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Linear Motion, 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,

A handwritten signature in black ink, appearing to read "Gina L. McCann". The signature is fluid and cursive, with the first name "Gina" being the most prominent.

Gina L. McCann  
Environmental Quality Specialist  
Air Quality Division  
989-439-2282

cc: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Chris Hare, EGLE