



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 11, 2022

VIA EMAIL ONLY

Daryl Mendrick  
Huron Casting, Inc and Blue Diamond Steel Casting  
7050 Hartley Street  
Pigeon, MI 48755

SRN: B7013, Huron County

Dear Daryl Mendrick:

**VIOLATION NOTICE**

On September 13 and 14, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Huron Casting, Inc and Blue Diamond Steel Casting located at 7050 Hartley Street and 125 Sturm Road, Pigeon, Michigan. The purpose of this inspection was to determine Huron Casting, Inc and Blue Diamond Steel 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, the conditions of Permit to Install (PTI) number 187-19, the conditions of Renewable Operating Permit (ROP) number MI-ROP-B7013-2018a; and Consent Order AQD number 4-2017.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Sitewide	MI-ROP-B7013-2018a, Section 1 & 2, FG-MACTZZZZZ, Special Condition (SC) V.1; ACO No. 4-2017, Sections 19 & 20; NESHAP Subpart ZZZZZ	Late NESHAP Subpart ZZZZZ test
Sitewide	MI-ROP-B7013-2018a, Section 1 & 2, FG-MACTZZZZZ, SC V.2; ACO No. 4-2017, Section 19; NESHAP Subpart ZZZZZ	Late NESHAP Subpart ZZZZZ test

Per the National Emissions Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources (NESHAP Subpart ZZZZZ), Huron Casting, Inc and Blue Diamond Steel Casting are required to demonstrate compliance with all applicable PM or

total metal HAP emissions limits in 40 CFR 63.10895 for a metal melting furnace or group of all metal melting furnaces no less frequently than every 5 years.

- The most recent compliance test for the Huron Casting Inc portion of the site was on July 26 and 27, 2016. It has been more than five years since the last compliance test. This is a violation of MI-ROP-B7013-2018a, Section 1, FG-MACTZZZZZ, SC V.1; the NESHAP Subpart ZZZZZ; and AQD Consent Order No. 4-2017, Sections 19-20.
- The most recent stack test for the Blue Diamond Steel Casting portion of the site was on July 6 and 7, 2017. It has been more than five years since the last compliance test. This is a violation of MI-ROP-B7013-2018a, Section 2, FG-MACTZZZZZ, SC V.1; the NESHAP Subpart ZZZZZ; and AQD Consent Order No. 4-2017, Sections 19-20.

Per the NESHAP Subpart ZZZZZ, Huron Casting, Inc and Blue Diamond Steel Casting are required to conduct each opacity test for fugitive emissions according to the requirements in 40 CFR 63.6(h)(5) and Table 1 of 40 CFR Part 63, Subpart ZZZZZ. The permittee shall conduct subsequent performance tests to demonstrate compliance with the opacity limit in 40 CFR 63.10895 no less frequently than every 6 months. Opacity tests for fugitive emissions appear to have been completed from 2013 to 2017 for Huron Casting, Inc and Blue Diamond Steel Casting, however, test results were not submitted in a timely manner for several of the tests. Opacity tests for fugitive emissions have not been completed since 2019.

- The missed opacity tests for fugitive emissions is a violation of MI-ROP-B7013-2018a, Section 1, FG-MACTZZZZZ, SC V.2; the NESHAP Subpart ZZZZZ; and AQD Consent Order No. 4-2017, Section 19 for the Huron Casting Inc site.
- The missed opacity tests for fugitive emissions is a violation of MI-ROP-B7013-2018a, Section 2, FG-MACTZZZZZ, SC V.2; the NESHAP Subpart ZZZZZ; and AQD Consent Order No. 4-2017, Section 19 for the Blue Diamond Steel Casting site.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 1, 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.

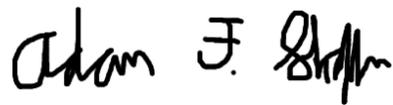
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Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Huron Casting, Inc or Blue Diamond Steel Casting believe 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 Huron Casting, Inc and Blue Diamond Steel Casting. 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 that reads "Adam J. Shaffer". The signature is written in a cursive style with a large initial "A" and "S".

Adam Shaffer  
Environmental Quality Analyst  
Air Quality Division  
989-225-4789

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