

## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENTAL QUALITY



KEITH CREAGH DIRECTOR

SRN: N3842, St. Clair County

SOUTHEAST MICHIGAN DISTRICT OFFICE

June 17, 2016

Mr. Jeremy Bul Becker Metal Works, Inc. 800 Fred Moore Highway St. Clair, Michigan 48079

Dear Mr. Bul:

## **VIOLATION NOTICE**

On June 15, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Becker Metal Works, Inc. (Facility), located at 800 Fred Moore Highway, St. Clair, Michigan. The purpose of this inspection was to determine the Facility'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 administrative rules; and the conditions of Permit to Install (PTI) No. 361-93A and 300-04.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Burnout oven #4 (heats ceramic mold during investment casting operation)	PTI No. 361-93A, Special Condition 15; Rule 301(c)	Visible emissions from burnout oven #4 exceeded 0% opacity.
Burnout oven #3 (heats ceramic mold during investment casting operation)	PTI No. 361-93A, Special Condition 16; Rule 910	Burnout oven #3 was loaded while its respective afterburner temperature was below 1800° F, and the afterburner was not operated at 1800° F for 30 minutes or more. According to the oven operator, the afterburner set point was 1000° F, and the mold had been loaded into the oven 15 minutes prior to observing the afterburner temperature at 980° F.

During this inspection, it was noted that the Facility burnout oven #4 was emitting opacity in excess of emissions allowed by Act 451, Rule 301(c), as noted above.

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Also, opacity exceeding 0% from burnout oven #3 was previously observed during a Facility visit on March 8, 2016.

On June 15, 2016, staff of the AQD observed operation of burnout oven #3 while the afterburner was operating improperly, as noted above. This constitutes a violation of Act 451, Rule 910, which requires that an air cleaning device shall be installed, maintained, and operated in a satisfactory manner, and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 8, 2016 (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.

In addition, please provide current stack dimensions for the stack associated with burnoff oven #1, and with SVAUTOCLAVE, the stack associated with the autoclave.

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 during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,

Sam Liveson

Environmental Engineer

Matt Deskins (For)

Air Quality Division

586-753-3749 or livesons1@michigan.gov

cc: Mr. Robert Hazuka, Becker Metal Works

Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ

Ms. Heidi Hollenbach, DEQ

Mr. Thomas Hess, DEQ

Mr. Chris Ethridge, DEQ