



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GAYLORD FIELD OFFICE



KEITH CREAGH  
DIRECTOR

May 10, 2016

Mr. Jason Harding, Operations Manager  
A & L Iron and Metal, Inc.  
P.O. Box 837  
Gaylord, MI 49735

SRN: N7508, Otsego County

Dear Mr. Harding:

**VIOLATION NOTICE**

On April 28 and 29, 2016 staff from, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted inspections of A & L Iron and Metal, Inc. located at 2000 Milbocker Road, Gaylord, Michigan. The purpose of the inspections was to determine A & L Iron and Metal, Inc.'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), and the administrative rules; and the conditions of Permit to Install (PTI) number 173-08.

During the inspections, the AQD's staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGENERATOR	Rule 301/ General Condition 11.	Visible emissions from EUGENERATOR exceeded the permitted 20 percent opacity limit.

During the inspections it was noted A & L Iron and Metal, Inc.'s EUGENERATOR locomotive diesel engine emitted opacity in excess of emissions allowed by Act 451, Rule 301.

Enclosed are copies of the instantaneous and six-minute average readings taken at A & L Iron and Metal, Inc. on April 28 and 29, 2016.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 31, 2016. 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.

Mr. Jason Harding, Operations Mgr. 2  
A & L Iron and Metal, Inc.

May 10, 2016

If A & L Iron and Metal, Inc. believes the above observations or statements are inaccurate or do not constitute a violation 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 the AQD's staff during our time at the facility. 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,



Becky Radulski  
Environmental Engineer  
Air Quality Division  
989-705-3404

Enclosures

cc: Ms. Janis Ransom, DEQ

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ

Ms. Heidi Hollenbach, DEQ

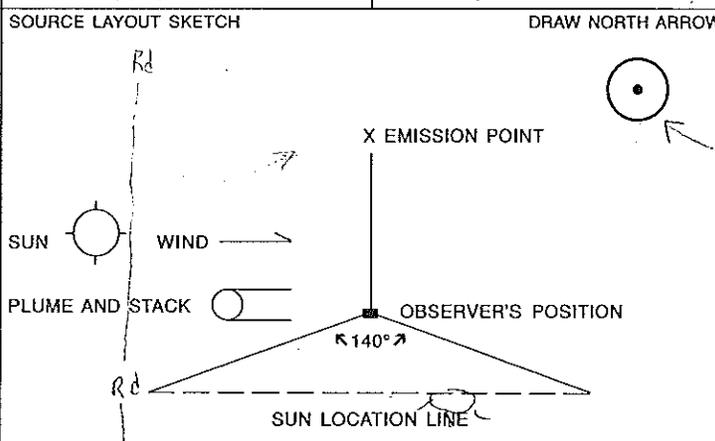
Mr. Thomas Hess, DEQ



DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

VISIBLE EMISSION OBSERVATION FORM

Provided under authority of P.A. 451 of 1994.

ESTABLISHMENT <i>A+L</i>		COUNTY <i>Osceola</i>		ESTABLISHMENT NUMBER <i>N7508</i>	
EQUIPMENT LOCATION <i>2000 Mibocken Rd</i>		DISTRICT <i>CAD/Gaylord</i>		DATE	MM DD YY <i>04 28 16</i>
CITY/TOWNSHIP <i>Gaylord</i>		OBSERVER <i>Tovello</i>		CERTIFIED BY / DATE <i>ETA 4/2016</i>	
PROCESS EQUIPMENT <i>Generator Engine</i>	OPERATING MODE <i>on</i>	BACKGROUND COLOR START <i>Blue w/ white</i> STOP <i>at white</i>	SKY CONDITIONS START <i>Partly Cloudy</i> STOP <i>Partly Cloudy</i>		
CONTROL EQUIPMENT <i>—</i>	OPERATING MODE <i>—</i>	WIND SPEED START <i>~5 mph</i> STOP <i>~5 mph</i>	WIND DIRECTION START <i>SSW</i> STOP <i>SSW</i>		
DESCRIBE EMISSION POINT <i>end of stack</i>		AMBIENT TEMPERATURE START <i>~60s</i> STOP <i>~60s</i>	HUMIDITY START <i>low</i> STOP <i>low</i>		
HEIGHT ABOVE GROUND LEVEL <i>48'</i>	HEIGHT RELATIVE TO OBSERVER <i>48'</i>	SOURCE LAYOUT SKETCH 		DRAW NORTH ARROW	
DISTANCE FROM OBSERVER <i>~200'</i>	DIRECTION FROM OBSERVER <i>E NE</i>				
DESCRIBE EMISSIONS START <i>From generator</i> STOP <i>From Generator</i>					
EMISSION COLOR START <i>Black</i> STOP <i>Black</i>	PLUME TYPE <input type="checkbox"/> CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT				
WATER DROPLETS PRESENT <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	IF WATER DROPLET PLUME <input type="checkbox"/> ATTACHED <input type="checkbox"/> DETACHED				
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START <i>one stack diameter beyond end of stack</i> STOP <i>same</i>					
DESCRIBE BACKGROUND START <i>sky</i> STOP <i>sky</i>					

START TIME *2:14 PM*

STOP TIME *2:22 PM*

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CONT. ON BACK

AVERAGE OPACITY =  $\frac{\text{SUM OF ANY 24 CONSECUTIVE READINGS}}{24}$       HIGHEST 6-MINUTE AVERAGE OPACITY *45.4*      2ND HIGHEST 6-MINUTE AVERAGE OPACITY *42.29*

COMMENTS *Black smoke. Periods of Black smoke above 20% the drop. Jason Harding + Brian Miller met AQD staff's Gloria Tovello + Becky Radwiski.*

*Gloria Tovello*

START TIME \_\_\_\_\_ STOP TIME \_\_\_\_\_

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AVERAGE OPACITY =  $\frac{\text{SUM OF ANY 24 CONSECUTIVE READINGS}}{24}$       HIGHEST 6-MINUTE AVERAGE OPACITY      2ND HIGHEST 6-MINUTE AVERAGE OPACITY

COMMENTS \_\_\_\_\_

START TIME \_\_\_\_\_ STOP TIME \_\_\_\_\_

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AVERAGE OPACITY =  $\frac{\text{SUM OF ANY 24 CONSECUTIVE READINGS}}{24}$       HIGHEST 6-MINUTE AVERAGE OPACITY      2ND HIGHEST 6-MINUTE AVERAGE OPACITY

COMMENTS \_\_\_\_\_



DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**VISIBLE EMISSION OBSERVATION FORM**  
Provided under authority of Public Act 451 of 1994

ESTABLISHMENT <b>A+L</b>		COUNTY <b>Osceola</b>		ESTABLISHMENT NUMBER <b>N7508</b>	
EQUIPMENT LOCATION <b>2000 Millbocker Rd</b>		DISTRICT <b>Gaylord</b>		DATE MM DD YY <b>04   29   16</b>	
CITY/TOWNSHIP <b>Gaylord</b>		OBSERVER <b>B. Radewski</b>		CERTIFIED BY / DATE <b>ETA 4/2016</b>	
PROCESS EQUIPMENT <b>Diesel engine</b>	OPERATING MODE <b>on</b>	BACKGROUND COLOR START <b>gray</b> STOP <b>gray</b>	SKY CONDITIONS START <b>overcast</b> STOP <b>overcast</b>		
CONTROL EQUIPMENT <b>none</b>	OPERATING MODE <b>N/A</b>	WIND SPEED START <b>~5 mph</b> STOP <b>~5 mph</b>	WIND DIRECTION START <b>SSW</b> STOP <b>SSW</b>		
DESCRIBE EMISSION POINT <b>engine stack</b>		AMBIENT TEMPERATURE START <b>~60°F</b> STOP <b>~60°F</b>	HUMIDITY START <b>low</b> STOP <b>low</b>		
HEIGHT ABOVE GROUND LEVEL <b>48'</b>	HEIGHT RELATIVE TO OBSERVER <b>48'</b>	SOURCE LAYOUT SKETCH DRAW NORTH ARROW 			
DISTANCE FROM OBSERVER <b>~200'</b>	DIRECTION FROM OBSERVER <b>E</b>				
DESCRIBE EMISSIONS START <b>puffing black</b> STOP <b>puffing black</b> <i>from engine stack</i>					
EMISSION COLOR START <b>black</b> STOP <b>black</b>	PLUME TYPE <input type="checkbox"/> CONTINUOUS <input type="checkbox"/> FUGITIVE <input checked="" type="checkbox"/> INTERMITTENT	SUN  WIND			
WATER DROPLETS PRESENT? <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	IF WATER DROPLET PLUME <input type="checkbox"/> ATTACHED <input type="checkbox"/> DETACHED	PLUME AND STACK			
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START <b>one stack diameter</b> STOP <b>same</b> <i>mid/end of stack</i>		OBSERVER'S POSITION 140'			
DESCRIBE BACKGROUND START <b>overcast sky</b> STOP <b>overcast sky</b>		NO visible sun - complete overcast			

↓ START TIME **9:50** STOP TIME **9:54** ↓

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AVERAGE OPACITY =	SUM OF ANY 24 CONSECUTIVE READINGS <b>24</b>	HIGHEST 6-MINUTE AVERAGE OPACITY <b>-</b>	2ND HIGHEST 6-MINUTE AVERAGE OPACITY <b>-</b>
COMMENTS <b>Black smoke - overcast, no sun. Stopped reading when A+L arrived at truck -&gt; Chris, Jason, Brian Miller</b>			

↓ START TIME 10:50am STOP TIME 11:05am

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35	X					X					X				
30													X		
25		X	X	X		X		X	X	X	X	X	X	X	X
20	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
15	X	X		X	X	X	X	X	X	X	X	X	X	X	X
10	X		X	X		X		X		X		X	X	X	X
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AVERAGE OPACITY = 24 HIGHEST 6-MINUTE AVERAGE OPACITY 39.8 2ND HIGHEST 6-MINUTE AVERAGE OPACITY 39.8

COMMENTS  
Black smoke - puffing. Prior to this reading crusher had shut down for about 10 minutes to clear something from conveyor belt.

↓ START TIME \_\_\_\_\_ STOP TIME \_\_\_\_\_ ↓

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AVERAGE OPACITY = 24 HIGHEST 6-MINUTE AVERAGE OPACITY \_\_\_\_\_ 2ND HIGHEST 6-MINUTE AVERAGE OPACITY \_\_\_\_\_

COMMENTS  
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