



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHER  
DIRECTOR

November 2, 2016

Mr. Lawrence L. Luchi, President  
Performance Springs, Inc.  
57575 Travis Road  
New Hudson, MI 48165-9753

SRN: P0763, Oakland County

Dear Mr. Luchi :

**VIOLATION NOTICE**

On October 26, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Performance Springs, Inc. (PSI or Performance) located at 57575 Travis Road, New Hudson, Michigan. The purpose of this inspection was to determine Performance Springs' 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

During the October 26, 2016, inspection, staff observed the following:

| Process Description   | Rule/Permit Condition Violated    | Comments   |
|---|-----------------------------------|--|
| Heating treating process lines (2) for springs.<br><br>Each line consisting of molten salt bath hardening, salt bath draw (low temperature draw salt), rinse bath, molten salt bath tempering, etc. | Rule 336.1201 (Permit-to-Install) | Performance Springs, Inc. (PSI) installed two molten salt bath heat treating lines without obtaining a Permit-to-Install prior to commencing heat treating operations. |

During this inspection, it was noted that Performance Springs had installed unpermitted heat treating lines at this facility. The AQD staff advised Performance Springs on October 26, 2016, that this is a violation of Act 451, Rule 201.

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A program for compliance may include a completed PTI application for two heat treating lines. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml](http://www.deq.state.mi.us/aps/nsr_information.shtml)

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice **by November 23, 2016** (which coincides with 21 calendar days from the date of this letter). 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.

If Performance Springs 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 violation cited above and for the cooperation that was extended to me during my inspection of Performance Springs. 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,



Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
586-753-3741 or konanahalli@michigan.gov

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Joyce Zhu, DEQ