



530 32nd Street SE
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November 20, 2022

Nate Leask

State Heat Treating Company

520 32nd Street SE

Grand Rapids, Michigan 49548

Dear April Lazzaro,

On October 18, 2024, State Heat Treating Company was issued a Violation Notice. The violation referenced "Discharge of visible emissions with a density greater than 20% opacity" Per General PTI No. 62-22 and General Condition No. 11 and Rule 301.

The Management team was notified that there was an excessive amount of "Smoke" being emitted from the building. The EGLE communicated this via phone and email on several occasions prior to the inspection. The Management team took action immediately after the first occurrence. Several inspections were performed on the equipment to determine the root cause of the "smoke".

It was determined that exhaust fans responsible for removing "smoke" from the facility had been turned off. This resulted in a heavy plume forming inside the building. When the fans were turned on the excessive "smoke" was exhausted very quickly and heavily.

Management has taken additional steps to prevent this issue from occurring in the future by creating work instructions that include instructions on when the ventilation fans need to be in operation. "The ventilation fans must be in operation if the furnace line is in operation."

In addition to the above violation, the EGLE issued an additional violation citing Rule 201 "Operating EU-P63 in an unpermitted manner." This is referencing the "purge" operation that is required by State Heat Treating while performing process adjustments on pusher furnaces. The process described above is utilized by State Heat Treating to adjust the furnace cycle times, temperature and atmosphere contents. The process includes loading scrap parts into furnace baskets in front of and behind Customer products as needed per OI-008. The OI-008 was created to ensure State Heat Treating was operating within the requirements of the CQI-9 Standard.

After review, Management has determined that the "purge" process that was being performed during the inspection is being done in a permitted manner. The "smoke" that is produced is unavoidable and within the permit restrictions. Discussions between the EGLE team and State Heat Treating Team determined that State Heat Treating will implement additional training as well as a Preventative Maintenance Task to monitor the condition of the scrap material used to help push product through the furnace and process furnace variables.

Sincerely,

Nate Leask

Plant Manager

State Heat Treating Company

616-206-9499



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