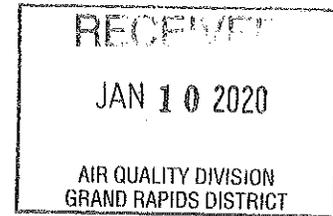




01-07-2020
Mr. Eric Grinstern
Environmental Quality Specialist
Air Quality Division



Dear Mr. Grinstern,
On December 17, 2019 John Belles received a certified letter containing a Violation Notice for Chrome Plating Operation and Electric Induction Furnaces. Please see below Hastings Manufacturing Company (HMC) response to the violation notice(s).

Regarding (2) Electric Induction Furnaces cited violation Rule 201 (R 336.1201) Operating without an air permit. Reviewing the history we have used R 336.1290 Permit to install exemption to operate. We have one material that represents less than 2% of our total iron poured that uses an F nickel shot as an additive. This addition precludes us from using Rule 290 as Nickel is not covered due to IRSL size. HMC then proposed using Rule 291 (R 336.1291) and believe that we are in compliance according to Rule 291 (2)(b).

HMC's metallurgist had calculated the total particulate fume generation for 2018 below:
 $1093.25 \text{ \# total particulate} \times 0.00011 = 0.12 \text{ \#/year}$
Expressed in tons: 0.00006 tons/year

Subsequently HMC has reviewed the process after your visit on December 4th and changed our process to make the F shot Nickel addition directly into the ladle as opposed to in the furnace. This change was implemented on 12-06-2019 eliminated F shot Nickel from being emitted from foundry stack(s). Please advise if you agree this change allows us to resume operating under Rule 290 (R 336.1290).

Regarding Chrome Plating Operation HMC is sited for PTI No. 277-86 Special condition 19 and Rule 910 (R 336.1910). Notes from the visit on December 4th indicated that the mesh pads in the scrubber showed sagging and signs of discoloration as evidence of non compliance to maintaining scrubber system. HMC did see some discoloration on the stage one wet pad and less on stage two wet pad which is expected per the process. HMC did not see any sign of discoloration on dry pad #3 and all scrubber pressure drops were in range across the board. The proper air pressure at the drops indicates that the sagging was not effecting the CFM and in compliance. HMC believes the scrubber system to be maintained and effective.

As a follow up to our conversation on 12-4-19:
HMC has ordered replacement mesh pads for stage 1 and 2 and will install by February 17th.
HMC will have scrubber #1 and scrubber #2 tested for compliance.
HMC will notify EGLE of the date of testing and submit the results after receipt.

If you feel the information presented above is incorrect, please cite the specific reason(s) so that we can work together towards an amiable solution.

Hastings Manufacturing Company strives to be a good corporate citizen to protect our employees, city, and environment. We look forward to continuing relationship with EGLE.

Thank you for your consideration of the information above.
Sincerely,

Dennis Graham
Vice President of Operations
Mobile: 269-779-1142