

A1864-VN-20180305

File



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

March 5, 2018

CERTIFIED MAIL – 7010 0290 0000 3734 2699
RETURN RECEIPT REQUESTED

Mr. Jim Matthews
Industrial Steel Treating Company
613 Carroll Avenue
Jackson, Michigan 49202

SRN: A1864, Jackson County

Dear Mr. Jim Matthews:

VIOLATION NOTICE

On February 28, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Steel Treating Company (Company) located at 613 Carroll Avenue, Jackson, Michigan. The purpose of this inspection was to determine the Company'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 Air Pollution Control Rules, and Permit to Install (PTI) PTI 394-07A

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
1000 gallon anhydrous ammonia tank located next to the West building. It is being used as a source of nitrogen for a carbonitriding process for the heat treating of metal.	Rule 201. No permit to install.	This ammonia tank may qualify for a General Permit to Install.
2300 gallon anhydrous ammonia tank located next to the East building. Used as the source of ammonia for a carbonitriding process	Rule 201. No permit to install.	This ammonia tank likely does not qualify for a General Permit to Install due to siting requirements.
Exhaust stacks from heat treat belt lines and other processes.	PTI 394-07A- FG-BELTLINES & FG-BATCHPUSHER VIII. STACK/VENT RESTRICTIONS.	Several stacks are equipped with rain-caps and do not discharge unobstructed vertically upwards as required.

During this inspection, it was noted that the Company had installed and commenced operation of unpermitted processes at this facility. The AQD staff advised the Company on 02/28/2018 that this could be a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application(s) for the ammonia tanks. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

A general permit to install application form may be found here:

<http://www.michigan.gov/deq/0,4561,7-135-3310-389804--,00.html>

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 violations and submit a written response to this Violation Notice by March 26, 2018. 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.

If the Company 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 this Company. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Mike Kovalchick
Environmental Engineer
Air Quality Division
517-416-5025

cc: Mr. Scott Miller, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ