



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

April 17, 2018

Mr. Donald Glover, President
Mueller Brass Company
2199 Lapeer Avenue
Port Huron, Michigan 48060

SRN: A6262, St. Clair County

Dear Mr. Glover:

VIOLATION NOTICE

On April 2, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Mueller Brass Company located at 2199 Lapeer Avenue, Port Huron, Michigan. The purpose of this inspection was to determine the facility'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 the conditions of Permit to Install (PTI) No. 180-00C.

AQD staff identified the following based on observations and information provided by the company during the inspection:

Process Description	Rule/Permit Condition Violated	Comments
Casting/Rod Mill Production Processes	PTI No. 180-00C FGSYSTEMB Special Condition IV.1 Rule 336.1910	Failure to maintain and operate Baghouse System B in a satisfactory manner.
Casting/Rod Mill Production Processes	PTI No. 180-00C FGSYSTEMC Special Condition IV.1 Rule 336.1910	Failure to maintain and operate Baghouse System C in a satisfactory manner.

Enclosed is a copy of the above cited rule.

On April 2, 2018, AQD staff Eric Grinstern, Lauren Magirl, and Remilando Pinga observed visible emissions from both Baghouse System B and C. AQD staff was informed that there was a seal leak at the compartment B5 guillotine gating system that closes off the chamber for cleaning while the VE observed in Baghouse System C may be due to the changing of the bags (1 compartment per day). AQD staff Mr. Grinstern and Mr. Pinga proceeded to enter the Casting Building while accompanied by Mueller Brass staff. AQD staff observed heavy smoke inside the building and around the melting

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furnaces associated with Casters 3 & 4 that exhaust emissions to Baghouse System B & C. It appears that the hoods located above each furnace to capture the emissions are inadequate and Baghouse System D hoods are not adequately capturing the smoke/VE inside the building thus causing fugitive emissions outdoor. The VE observed in the Casting Building and at the baghouse systems may also potentially be caused by poor maintenance or inadequate control system.

This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. The above observations are also in violation of PTI No. 180-00C, FGSYSTEMB Special Condition IV.1 and FGSYSTEMC Special Condition IV.1.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 1 which coincides with 14 calendar days from the date of this letter. 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 Mueller Brass believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to AQD staff during inspection of your facility. 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,



Remilando Pinga
Senior Environmental Engineer
Air Quality Division
586-753-3723

cc/via e-mail: Mr. Dave Struble, Mueller Brass Company
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ
Ms. Joyce Zhu, DEQ