



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHER  
DIRECTOR

May 15, 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. During the post inspection meeting, AQD staff requested Mueller Brass for additional records and documents to demonstrate compliance with the above applicable requirements. On May 1, 2018, Mueller Brass submitted the additional requested information for compliance evaluation.

Upon review of the submitted information, AQD staff identified the following:

Process Description	Rule/Permit Condition Violated	Comments
Casting/Rod Mill Production Processes	<ul style="list-style-type: none"> <li>PTI No. 180-00C, FGSYSTEMB, Special Condition IV.2</li> <li>Rule 336.1910</li> </ul>	While operating, no pressure drop records for Baghouse System B were available during some days in November and December 2017. This appears to be a failure to maintain and operate Baghouse System B pressure drop indicator in a satisfactory manner and a failure to operate the air cleaning device in a satisfactory manner.
Casting/Rod Mill Production Processes	<ul style="list-style-type: none"> <li>PTI No. 180-00C, FGSYSTEMC, Special Condition IV.2</li> </ul>	While operating, no pressure drop records for Baghouse System C were

	<ul style="list-style-type: none"><li>• Rule 336.1910</li></ul>	available during some days in November 2017 and January 2018. This appears to be a failure to maintain and operate Baghouse System C pressure drop indicator in a satisfactory manner and a failure to operate the air cleaning device in a satisfactory manner.
Casting/Rod Mill Production Processes	<ul style="list-style-type: none"><li>• PTI No. 180-00C, FGSYSTEMC, Special Condition IV.3</li><li>• PTI No. 180-00C, FGFACILITY, Special Condition III (PM/MAP (3.3 &amp; 4.0))</li><li>• Rule 336.1910</li></ul>	Failure to maintain and operate Baghouse System C pressure drop between 4.0 and 12.0 inches W.G. across each operating compartment (or module). This practice is inconsistent with the March 2016 PM/MAP operating requirements and failure to operate the air cleaning device in a satisfactory manner.
Casting/Rod Mill Production Processes	<ul style="list-style-type: none"><li>• PTI No. 180-00C, FGSYSTEMC, Special Condition VIII</li><li>• Rule 336.1910</li></ul>	Failure to discharge the exhaust gases from the Baghouse System C "unobstructed vertically upwards". Failure to operate the air cleaning device in a satisfactory manner.
Casting/Rod Mill Production Processes	PTI No. 180-00C FGFACILITY Special Condition III (PM/MAP (3 & 4))	Submitted records on daily baghouse check sheets (8/1/2017 through 4/2/2018) and Caster 3 & 4 furnace melts (10/1/2017 through 4/1/2018) showed inconsistent compliance with the PM/MAP.

Enclosed is a copy of the above cited rules.

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During the April 2, 2018 inspection, AQD staff Eric Grinstern, Lauren Magirl, and Remilando Pinga requested for furnace melt records, daily baghouse check sheets, safety data sheets, records to show compliance with PTI No. 180-00C pollutant emission limits and the facility's Preventative Maintenance (PM) and Malfunction Abatement Plan (MAP).

AQD staff conducted a review process on the records obtained from Mueller Brass which included Caster 3 & 4 melts (10/01/2017 through 4/01/2018) and daily A.A.F Baghouse Check Sheets (8/01/2017 through 4/02/2018).

AQD staff observed the absence of pressure drop data on either some or all compartments of Baghouse System B on 11/10/2017, 11/14/2017, and 12/04/2017; and Baghouse System C for 11/10/2017 and 1/19/2018. Records indicated that the corresponding casting furnaces were operating based on the presence of daily melt data but no pressure drop data were available on the corresponding dates. The recorded pressure drops readings in A.A.F Baghouse Check Sheets were above the PTI No. 180-00C, FGSYSTEMC, Special Condition IV.3 of 12.0 inches W.G. for 8/3, 4, 10/ 2017 and 11/12/2017, and below 4.0 inches W.G. for 8/30/2017. These pressure drops readings were non-compliant with the pressure drops requirement in PTI No. 180-00C and inconsistent with certain provisions of the PM/MAP. From the August 1, 2017 through April 2, 2018 submitted A.A.F Baghouse Check Sheets, AQD staff observed multiple dates of baghouse related PM/MAP issues, such as baghouse fires, visible emissions, contaminant leaks, absence of pressure data during melts, baghouse compartments/pressure monitoring not operating for long periods of time, etc. These are indications of improper operation of the baghouse air contaminant emissions control system and non-compliant of the applicable requirements as cited above.

During inspection, AQD staff also observed that the exhaust air from the Baghouse System C was emitted through side ports and not "discharged unobstructed vertically upwards to the ambient air" as required by PTI No. 180-00C, Special Condition, FGSYSTEMC VIII. This is also non-compliant of the permit as cited above.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 29 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.

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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