



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

June 29, 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 May 22, 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 to investigate a recent complaint which we received on May 21, 2018, regarding fugitive dust attributed to the facility's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Casting/Rod Mill Production FGSYSTEMB	R336.1901(b)	Observed fugitive dust on the complainant's vehicles is believed to have originated from Mueller Brass.

In the professional judgment of AQD staff, the dust fallout that was observed on the complainant's vehicles, and then collected and analyzed to verify it was characteristically similar to material collected from Mueller Brass, is a violation of Rule 901 of Act 451

The AQD staff conducted investigation per the May 21, 2018 fallout complaint received by the AQD Southeast Michigan District office. The complainant showed particulate matter fallout on his vehicles. Samples were taken from the complainant's vehicles and Mueller Brass Company superstack staging area. The results from the microscopic analyses showed:

- "The fallout sample is mostly comprised of opaque metallic debris (75%)."

Mr. Donald Glover

Page 2

June 29, 2018

- The metallic debris is a compositional match for the standard material from Mueller Brass.
- The metallic fines which comprise the majority of the fallout samples are also a match in both structure and morphology as well."

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 20, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Mueller Brass 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 violation cited above and for the cooperation that was extended to me during my inspection of your facility. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Lauren Magirl  
Environmental Engineer  
Air Quality Division  
586-753-3797

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ