



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GRETHUR  
DIRECTOR

September 20, 2017

Mr. Adam Perry, Vice President of Operation  
Global Titanium, Inc.  
19300 Filer Avenue  
Detroit, MI 48234

SRN: A8892, Wayne County

Dear Mr. Perry:

**VIOLATION NOTICE**

On June 8 and 27, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Global Titanium located at 19300 Filer Avenue, Detroit, Michigan. The purpose of this inspection was to determine Global Titanium'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 Wayne County Installation Permit (WCIP) C-11750.

As a result of the inspections on June 8 and 27, 2017, and review of associated records, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Two Ferrotitanium Induction-Type Furnaces with Associated Baghouse Dust Collection System	WICP C-11750, Special Condition 25	The maximum furnace temperature exceeded 2,700°F and 5 percent variance (2,835°F).
Wash Building 2 – Titanium Dryer	R 336.1201(1)	Installation of a titanium dryer, titanium crushers, and metal shredder without obtaining a permit to install pursuant to R 336.1201(1).
Melt Shop - Kue Ken 90 Crusher		
TICO Building - Kue Ken 55 Crusher		
TICO Building - Roll Crusher		
Torch Cutting Area – Metal Shredder		

### **Induction-Type Furnace Temperature Exceedances**

WCIP C-11750 requires that the maximum furnace temperature not exceed 2,700°F, with an allowable variance of 5 percent. According to records provided by Global Titanium, the temperature of each furnace is measured every 5 heats per furnace. Recorded furnace temperatures were provided for May 2, 2017 through May 30, 2017. A five percent variance equates to 2835°F. According to records provided, the furnace temperature exceeded 2835°F 17 times at Furnace 1 (17/75 = 23% operating time) and 18 times at Furnace 2 (18/76 = 24% operating time). The highest reported furnace temperatures are as follows: Furnace 1 – 2956°F at 1:46 PM on May 18, 2017, Furnace 2 - 2960°F at 6:53 AM on May 18, 2017. This is a violation a WCIP C-11750, Special Condition 25.

### **Rule 201 Violations**

R 336.1201(1) (Rule 201) is defined as follows.

Rule 201. (1) Except as allowed in R 336.1202, R 336.1277 to R 336.1291, or R 336.2823(15) a person shall not install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment pertaining thereto, which may emit any of the following, unless a permit to install that authorizes such action is issued by the department.

- (a) Any air pollutant regulated by title I of the clean air act and its associated rules, including 40 C.F.R. §51.165 and §51.166, adopted by reference in R 336.1902.
- (b) Any air contaminant.

During the inspections on June 8 and 27, 2017, it was noted that the Wash Building 2 titanium dryer, the Melt Shop Kue Ken 90 crusher, the TICO Building Kue Ken 55 crusher and roll crusher, and Torch Cutting Area metal shredder are operating with emissions vented to the outside ambient air.

On September 14, 2017, Global Titanium's consultant, Mr. Bruce Bawkon, ASTI Environmental, provided an email indicating the that Global Titanium is claiming permit to install exemptions for the above listed equipment. After review of the email, the AQD disagrees with GTI's assessment that the metal shredder is exempt under R 336.1285(2)(l)(vi)(A). Based on the description provided in the email, the metal shredder is operated 3 days per week (approximately 24 hours per week) and material is transported to furnaces for melting. Because the metal that is shredded is used in the furnace, this is not considered "nonproduction". Additionally, the email provided includes proposed calculations to demonstrate that the titanium dryer and crusher emissions meet R 336.1290. However, records were not provided and have not been maintained. At this time, it is unknown if emissions from the titanium dryer, Kue Ken 55 and Roll Crusher qualify for the R 336.1290 exemption. The email did not address the Melt Shop Kue Ken 90 crusher.

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The AQD staff advised Mr. Adam Perry on September 19, 2017 that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the above listed process equipment. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right hand side of the page)

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 October 11, 2017 (which coincides with 21 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 Global Titanium 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 Global Titanium. 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,



Todd Zynda, P.E.  
Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Ms. LaReina Wheeler, City of Detroit, BSEED  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ