



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
MARQUETTE DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 20, 2021

VIA E-MAIL

Mr. Kent Lewis
Grede, LLC – Iron Mountain
801 South Carpenter Avenue
Kingsford, Michigan 49802

SRN: B1577, Dickinson County

Dear Mr. Lewis:

Thank you for providing the response to the July 15, 2021, Violation Notice (VN). The following is a list of responses that explains the AQD's position after reviewing Grede's VN response, dated August 2, 2021, along with a request for follow-up procedures:

1. Grede is required to maintain and implement an Operation and Maintenance (O&M) Plan. The O&M Plan (Rev. March 27, 2020) requires "Monthly observations of the physical appearance of the capture and ventilation system equipment (holes, dents, accumulated dust, fan condition). This will be performed in routine monthly equipment preventative maintenance (PM) and noted."

Also, 40 CFR 63.7710(b)(1) states: "Monthly inspections of the equipment that is important to the performance of the total capture system (*i.e.*, pressure sensors, dampers, and damper switches). This inspection must include observations of the physical appearance of the equipment (*e.g.*, presence of holes in the ductwork or hoods, flow constrictions caused by dents or accumulated dust in the ductwork, and fan erosion). The O&M Plan must also include requirements to repair the defect or deficiency as soon as practicable."

Grede states the facility has not been recording external baghouse observations and believes they are not in violation of the O&M Plan by completing required PM's. However, based on a review of the O&M Plan, 40 CFR 63.7710(b)(1), and observations during the inspection, Grede was not entirely following the O&M Plan and was in violation of the listed rules/permit conditions.

Monthly inspections of the physical appearance and condition of the capture control equipment needs to be added to the PM check sheet. Please provide an updated PM check sheet that includes the monitoring of the physical appearance of the capture control systems. Also, please provide a date of when the external baghouse repair was completed.

2. From reviewing Grede's 2020 semiannual and annual compliance and deviation reports, the facility did not list deviations from FGMACTEEEEEE nor followed the requirements of 40 CFR 63.7751. According to 40 CFR 63.7751(b)(5), if there were no deviations from any emissions limitations (including operating limit), work practice standards, or operation and maintenance requirements, the report shall contain a statement that there were no deviations from the emissions limitations, work practice standards, or operation and maintenance requirements during the reporting period. Either this statement or deviations from FGMACTEEEEEE should have been included in the semiannual ROP compliance and deviation reports. Beginning March 9, 2021, the facility is required to submit MACT EEEEE compliance and deviation reports through Compliance and Emissions Data Reporting Interface.
3. From general observations on the roof, visible emissions were observed from a leak in the main exhaust duct of the cupola. As mentioned above, Grede is required to inspect the physical appearance and condition of capture control equipment, including the presence of holes or leaks in the ductwork. Based on the observations during the inspection, Grede did not appear to be operating in compliance with the O&M Plan. These checks should be included as part of the PM check sheet for the cupola control system. Please provide an updated PM check sheet that includes the monitoring of the physical appearance of the capture control system. Also, please provide a date of when the repair was completed.
4. The stack height violations on the East Fuller, West Fuller, and Linsmeyer baghouses have been addressed. Please provide dates of these repairs.
5. The request to remove the Hermann Baghouse will need to be included as part of the project in the upcoming permit modification application.
6. From general observations during the inspection of the sand conditioning system, it was evident of a leak in the ductwork that conveyed the sand through the conditioning system. Significant sand had accumulated on the plant floor around the sand conditioning system and Grede personnel stated there was a leak in the pipe at the time of the inspection. The sand conditioning system did not appear to be in compliance with the O&M Plan as required in Special Condition III.1. With having an overhead door to the sand conditioning system, the accumulated sand on the plant floor could become a potential fugitive dust issue outside the plant. Weekly inspections of the ductwork to the sand conditioning system should be added to the PM check sheet. Please provide a date of when the repair was completed.

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Following the inspection on June 21, 2021, and a review of Grede's O&M Plan (Rev. March 27, 2020), it was determined the O&M Plan is not meeting all requirements as listed in MI-ROP-B1577-2020 and 40 CFR 63.7710. The current O&M Plan does not adequately provide a detailed description of the PM and frequency required for each capture control system. The updated O&M Plan shall provide a detailed description of the following for each capture control system:

1. Items or conditions that shall be inspected for routine and long-term maintenance that is important to the performance of the capture control system.
2. The frequency or schedule of inspections and repairs for PM on each capture control system, and identification of the major replacement parts that shall be maintained in inventory for quick replacement.
3. The PM check sheet template for each capture control system.
4. Monitoring plan for each bag leak detection system and a corrective action plan for each baghouse.

Please provide an updated O&M Plan, for AQD review and approval, addressing each of the above listed requirements within 45 days of this letter. Please contact me if you have any questions.

Sincerely,



Michael Conklin
Environmental Engineer
Air Quality Division
906-202-0013

cc: Mr. Tyler Hill, Grede
Mr. Tom White, Grede
Mr. Paul Blindauer, GEI
Ms. Jenine Camilleri, EGLE
Ms. Erin Moran, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Ed Lancaster, EGLE