



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 10, 2013

Mr. Scott Flaminio, Environmental Manager
Grede LLC. – Iron Mountain
801 South Carpenter Avenue
Kingsford, Michigan 49802

SRN: B1577, Dickinson County

Dear Mr. Flaminio:

VIOLATION NOTICE

On September 18, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Grede LLC. – Iron Mountain located at 801 South Carpenter Avenue, Kingsford, Michigan. The purpose of this inspection was to determine Grede LLC. – Iron Mountain’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 administrative rules; and the conditions of Renewable Operating Permit (ROP) Number MI-ROP-B1577-2009a.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|-----------------------------------|--|---|
| Ductile Iron EU-P044 | ROP No. MI-ROP-B1577-2009a, EU-P044 Ductile Iron, Special Condition V.1; 40 CFR 63.7730(a) | Failure to conduct performance testing within 180 days of startup. |
| | ROP No. MI-ROP-B1577-2009a, EU-P044 Ductile Iron, Special Condition VI.1; 40 CFR 63.7740(b) | Failure to maintain a bag leak detection system. |
| Main Plant Sand System EU-P012 | ROP No. MI-ROP-B1577-2009a, EU-P012, Special Condition IX.1; 40 CFR Part 64 | Operation of wet scrubber outside of established pressure drop and fan amperage ranges. |
| Main Plant Shakeout EU-P018 | ROP No. MI-ROP-B1577-2009a, EU-P018, Special Condition IX.1; 40 CFR Part 64 | Operation of wet scrubber outside of established pressure drop range. |

During this inspection it was determined that Grede LLC. – Iron Mountain failed to conduct performance testing for particulate matter from the ductile iron furnaces within 180 days of startup, as required by 40 CFR Part 63, Subpart ZZZZZ. Also, during the inspection the required bag leak detection system for the baghouse controlling emissions from the ductile iron furnaces was observed to be unplugged. Upon the unit being plugged in, the alarm associated with excessive particulate loading sounded. Additionally, during the inspection the pressure

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drop associated with the wet scrubbers controlling emissions from the Main Plant Sand System and Main Plant Shakeout were observed to be outside of the established operating ranges. For the Main Plant Sand System, the wet scrubber fan amperage was also observed to be outside of the established operating range. Review of pressure drop records showed previous readings outside the established operating ranges with no documented corrective action as required by 40 CFR Part 64.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 30, 2013. 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 recurrence.

If Grede LLC. – Iron Mountain 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 Grede LLC. – Iron Mountain. 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,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-0266

cc: Mr. Chris Hare, DEQ
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Ed Lancaster, DEQ