



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 23, 2015

Mr. Jack Bomberg, EHS Supervisor
Grede LLC. – Iron Mountain
801 South Carpenter Avenue
Kingsford, Michigan 49802

SRN: B1577, Dickinson County

Dear Mr. Bomberg:

VIOLATION NOTICE

On July 20, 2015, 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-B1577-2014.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Cupola EU-P009	ROP No. MI-ROP-B1577-2014, EU-P009, Special Condition (SC) VI.10	Fan amperage outside of established range at the time of the inspection.
	ROP No. MI-ROP-B1577-2014, EU-P009, SC VI.13	Visible emissions observed from the baghouse at the time of the inspection.
Main Plant Sand System EU-P012	ROP No. MI-ROP-B1577-2014, EU-P012, SC VI.1	Failure to record the daily pressure drop across the wet dust collector on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P012, SC VI.4	Failure to record the daily wet dust collector fan amperage on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P012, SC VI.2	Wet dust collector pressure drop outside of established range at the time of the inspection.
	ROP No. MI-ROP-B1577-2014, EU-P012, SC VI.4	Wet dust collector fan amperage outside of established range at the time of the inspection.

Process Description	Rule/Permit Condition Violated	Comments
Main Plant Finishing EU-P014	ROP No. MI-ROP-B1577-2014, EU-P014, SC VI.1	Failure to record the daily pressure drop across the baghouses on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P014, SC VI.4	Failure to record the daily baghouse fan amperages on 24 occasions.
Main Plant Shakeout EU-P018	ROP No. MI-ROP-B1577-2014, EU-P018, SC VI.1	Failure to record the daily pressure drop across the wet dust collector on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P018, SC VI.4	Failure to record the daily wet dust collector fan amperage on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P018, SC VI.2	Wet dust collector pressure drop outside of established range at the time of the inspection.
	ROP No. MI-ROP-B1577-2014, EU-P018, SC VI.5	Wet dust collector fan amperage outside of established range at the time of the inspection.
Isocure EU-P021	ROP No. MI-ROP-B1577-2014, EU-P021, SC III.1	Failure to record the acid scrubber pH and flow rate each shift on 24 days.
	ROP No. MI-ROP-B1577-2014, EU-P021, SC III.1	Acid scrubber pH and flow rate recorded daily, while permit requires recording each shift.
Module Sand System EU-P032	ROP No. MI-ROP-B1577-2014, EU-P032, SC VI.1	Failure to record the daily pressure drop across the wet dust collector on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P032, SC VI.4	Failure to record the daily wet dust collector fan amperage on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P032, SC VI.2	Wet dust collector pressure drop outside of established range at the time of the inspection.
	ROP No. MI-ROP-B1577-2014, EU-P032, SC VI.4	Wet dust collector fan amperage outside of established range at the time of the inspection.

Process Description	Rule/Permit Condition Violated	Comments
Module Finishing EU-P034	ROP No. MI-ROP-B1577-2014, EU-P034, SC VI.1	Failure to record the daily pressure drop across the wet dust collector on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P034, SC VI.3	Failure to record the daily wet dust collector fan amperage on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P034, SC VI.2	Wet dust collector pressure drop outside of established range at the time of the inspection.
	ROP No. MI-ROP-B1577-2014, EU-P034, SC VI.3	Wet dust collector fan amperage outside of established range at the time of the inspection.
Module Shakeout EU-P038	ROP No. MI-ROP-B1577-2014, EU-P038, SC VI.1	Failure to record the daily pressure drop across the wet dust collector on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P038, SC VI.4	Failure to record the daily wet dust collector fan amperage on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P038, SC VI.2	Wet dust collector pressure drop outside of established range at the time of the inspection.
	ROP No. MI-ROP-B1577-2014, EU-P038, SC VI.4	Wet dust collector fan amperage outside of established range at the time of the inspection.
Sand Conditioning System EU-P040	ROP No. MI-ROP-B1577-2014, EU-P040, SC VI.1	Failure to record the daily pressure drop across the baghouses on 24 occasions.
	ROP No. MI-ROP-B1577-2014, EU-P040, SC VI.4	Failure to record the daily baghouse fan amperages on 24 occasions.
Module Isocure EU-P043	ROP No. MI-ROP-B1577-2014, EU-P043, SC III.1	Failure to record the acid scrubber pH and flow rate each shift on 24 days.
	ROP No. MI-ROP-B1577-2014, EU-P043, SC III.1	Acid scrubber pH and flow rate recorded daily, while permit requires recording each shift.

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Process Description	Rule/Permit Condition Violated	Comments
FGMACT-EEEEEE	ROP No. MI-ROP-B1577-2014, FGMACT-EEEEEE, SC V.1 40 CFR 63.7753(b)	Failure to conduct fugitive opacity testing within the required 6-month time period. Testing conducted late in 2014 and 2015.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 14, 2015. 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 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
Mr. Joe Scanlan, DEQ