



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 15, 2021

VIA E-MAIL

Mr. Tyler Hill
Grede, LLC - Iron Mountain
801 South Carpenter Avenue
Kingsford, Michigan 49802

SRN: B1577, Dickinson County

Dear Mr. Hill:

VIOLATION NOTICE

On June 22, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Grede, LLC - Iron Mountain (Grede) located at 801 South Carpenter Avenue, Kingsford, Michigan. The purpose of this inspection was to determine Grede'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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1577-2020; Consent Order AQD number 2021-01; and to investigate a recent complaint which we received on June 16, 2021, regarding fallout attributed to Grede's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-P009 Cupola	Special Condition III.1, Paragraph 9.A and 13.A of AQD No. 2021-01	Panels on the south facing side of the baghouse were not intact and blowing outwards.
FGMACTEEEEEE	Special Condition IV.1, Paragraph 9.A and 13.A of AQD No. 2021-01	Maintenance on the baghouse did not appear to be following the Operation and Maintenance Plan (O & M Plan) based on gaps observed in the baghouse structure.
FGMACTEEEEEE	Special Condition VII.4 and 5	The facility has not been certifying compliance explicitly with 40 CFR Part 63, Subpart EEEEE when submitting the ROP compliance and deviation reports.

EU-P009 Cupola	Special Condition III.1, Paragraph 9.A and 13.A of AQD No. 2021-01	An exhaust leak around the cap area of the main exhaust duct was causing uncontrolled emissions.
EU-P014 Main Plant Finishing	Special Condition VIII.1	Stack height of East Fuller baghouse does not meet the minimum height requirement.
EU-P014 Main Plant Finishing	Special Condition VIII.2	Stack height of West Fuller baghouse does not meet the minimum height requirement.
EU-P018 Main Plant Shakeout	Special Condition IV.1	The Hermann baghouse was observed not entirely installed and not operating.
EU-P018 Main Plant Shakeout	Special Condition VIII.2	Stack height of the Linsmeyer baghouse does not meet the minimum height requirement.
EU-P040 Sand Conditioning System	Special Condition III.1, Paragraph 13.A of AQD No. 2021-01	Significant amount of sand observed around the floor of the Sand Conditioning System due to a pipe leak.

On June 22, 2021, the AQD staff observed gap/holes in the south facing side of the cupola baghouse structure. The panels were observed being blown outward indicating emissions were being vented at this point since the unit is under positive pressure. A range finder was used to measure the height at which the panels were shown not intact. A height of 42.6 feet was measured. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries. These standards are found in 40 CFR Part 63, Subpart EEEEE. Grede is required to maintain an O & M Plan for each capture and control system for an emission unit subject to an emission limit as described in 40 CFR 63.7710. The O & M Plan states there are monthly observations of the physical appearance of the capture and ventilations system equipment (holes, dents, accumulated dust, fan condition). However, during the inspection, there were gaps in the panels of the baghouse on the south facing side that could cause a point of emission. Based on these observations, the inspections and maintenance on the baghouse are not following the O & M Plan for the facility.

From reviewing Grede's semiannual and annual ROP compliance reports, MACT EEEEE certification of compliance is not included in these reports. The facility should be including MACT EEEEE compliance certification in the "Other Report Certification" box. If there were no deviations from any emissions limitations (including operating limit), work practice standards, or operation and maintenance requirements from MACT

EEEE, there should be a statement that there were no deviations from the emissions limitations, work practice standards, or operation and maintenance requirements during the reporting period. If there were deviations from MACT EEEEE requirements, Grede is required to include all reporting requirements according to 40 CFR 63.7751(a)(7).

During the inspection, AQD staff utilized a Nikon Forestry Pro II Rangefinder to determine the stack height of SV-S014-324128, SV-S014-324132, and SV-S018-324372-B. Measurements indicated stack heights of less than the minimum stack height requirements listed in MI-ROP-B1577-2020. The measurements recorded with the rangefinder were 25 ft for SV-S014-324128 and SV-S014-324132, and 23.1 ft for SV-S018-324372-B. The AQD staff informed Grede staff of these findings during the inspection.

During the inspection, the Linsmeyer and Torit #1 baghouses were installed and operational, but the Hermann baghouse was not for EU-P018 Main Plant Shakeout. The Hermann baghouse is installed on-site but no ductwork is connected, and the baghouse is not in operation. Based on observations during the inspection, the shakeout process is not meeting all design/equipment requirements with not having the Hermann baghouse operational.

During the inspection of EU-P040 Sand Conditioning System, AQD staff observed a significant amount of sand that had accumulated on the floor in the Sand Conditioning area. At the time, Grede staff stated there had been a leak in the duct that conveys the sand. The accumulated material and leak could cause a potential fugitive dust issue. The Sand Conditioning System does not appear to be following the O & M Plan.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 5, 2021 (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.

Please submit the written response to EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Grede 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. 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,

A handwritten signature in cursive script that reads "Michael Conklin".

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

cc: Mr. Tom White, Grede
Mr. Kent Lewis, Grede
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Ed Lancaster, EGLE
Ms. Erin Moran, EGLE