



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 17, 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 September 28, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation 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; 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 September 26, 2021, regarding particulate fallout attributed to Grede's operations.

During the investigation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Particulate fallout from foundry operations	R 336.1901(b), General Condition 12 of MI-ROP-B1577-2020	Emissions of metal particulate causing injurious effects to property and unreasonable interference with the comfortable enjoyment of life and property.

A complaint was received via e-mail on September 26, 2021, regarding fallout noticed on property that is believed to be attributed to Grede's operations. The complainant noticed brown metal particles on their vehicle a couple days prior to filing the complaint with the AQD. A site investigation was performed on September 28, 2021, to collect samples from the complainant's vehicle and from Grede to determine if the material is a match through a composition analysis.

Two ghost wipe samples were taken off the hood of the complainant's vehicle at 10:56 a.m. eastern standard time (EST). After meeting with the complainant and taking samples, three samples were then taken at the Grede foundry. The source of the fallout from the Grede foundry is believed to come from finishing operations. The Steelcraft baghouse, that is a control device for EU-P014 Main Plant Finishing, had visible emission events and excursions in the past. Two samples of material from the Steelcraft baghouse were collected at 12:11 p.m. EST.

The samples were taken by Grede personnel from the dumpster that the baghouse hoppers are emptied into. The third sample from Grede was taken on the roof, behind the Steelcraft baghouse, with a ghost wipe at 12:49 p.m. EST. All five samples were submitted to the EGLE Laboratory on September 20, 2021, to be analyzed for metals.

Final results of the sample analysis were provided on December 8, 2021. The results indicate a resemblance in the chemical composition of the three sample locations. Higher amounts of iron, chromium, copper, and manganese were detected in all three sample locations compared to other metals analyzed. The chemical composition of gray iron castings is known to contain these four alloying elements. Based on the lab results and the proximity of the complaint location to Grede, the AQD believes the particulate fallout detected is associated with Grede's foundry operations.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 6, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 violation cited above and for the cooperation that was extended to me during my inspection of Grede. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Ed Lancaster, EGLE