



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

July 16, 2018

Mr. Dave Bent  
Metal Technologies, Inc.  
429 Fourth Street  
Three Rivers, Michigan 49093

SRN: B2015, St. Joseph County

Dear Mr. Bent:

### **VIOLATION NOTICE**

On July 2, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint investigation of Metal Technologies, Inc. (Facility), located at 429 Fourth Street, Three Rivers, Michigan. The purpose of this investigation was to evaluate a recent complaint that the DEQ, AQD, received on June 26, 2018, regarding fallout damage to their vehicles, located at 642 Spring Street, Three Rivers, Michigan, that was attributed to foundry operations.

On March 5, 2018, the DEQ, AQD, conducted a similar fallout investigation in follow-up to several complaints first received on February 28, 2018. Based on particulate matter analysis of samples collected from various complainant vehicles and from a sample collected at the Facility from the dust discharge bin for the North Fuller baghouse associated with FGCLEANING; along with two known baghouse control issues determined during the fallout complaint investigation that coincides within the time period when the complainants noticed damage to their vehicles, the DEQ, AQD, sent a violation notice to the Facility on April 23, 2018. The Facility replaced all of the pulse jet tubing and bags in the North Fuller baghouse as a result of the complaint investigation.

On June 27, 2018, staff from the DEQ, AQD, notified the Facility of the most recent fallout complaint and requested Facility records, including daily pressure drop readings and visible emission observations for the North Fuller baghouse and exhaust stack, along with any other available maintenance and inspection records (black light test or other internal inspection) for June 4-22, 2018.

On July 3, 2018, the Facility provided visible emission, maintenance, and inspection records for the North Fuller baghouse. The records indicate that abnormal visible emissions were noted from the baghouse exhaust stack on June 21, 2018, and the FGCLEANING process was immediately shut down. Maintenance staff conducted a black light test and two bad bags were found. The Facility then brought in a contractor, Waltz-Holst, to conduct an internal inspection. The deflector plate was determined to be functional; however, three additional broken bags were found and replaced.

On July 2, 2018, staff from the DEQ, AQD, met with the complainant at their residence to further discuss their June 26, 2018, complaint call and to look at their vehicles (2016 White Chevrolet Trax and 2011 Black Chevrolet Silverado) for potential damage to the paint finish, trim, and windows. Per the complainant, damage was first observed on June 14, 2018.

After a June 18, 2018, inspection by the insurance company, the complainant stated that they believed additional damage (orange/rust spotting) had occurred. The complainant stated that their vehicles had similar finish damage back in February 2018, and that their insurance company paid to repair the SUV. Metal Technologies paid to have the finish repaired on the truck, which does not have comprehensive coverage. The finish damage observed by DEQ, AQD, staff was very similar in spot coloring, size, and surface texture as noted during the March 5, 2018, complaint investigation.

Based on similarities in paint finish damage between the complaint investigations, favorable meteorological conditions (wind direction and speed) within the time period identified by the complainant, and identified baghouse control issues that coincides within the same time period, staff of the DEQ, AQD, is citing the following recurring violations:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
FGCLEANING - Iron castings are cleaned in shot blast machines	Rule 901(b)/MI-ROP-B2015-2013c, Part A, General Condition No. 12.b	Particulate emissions attributed to the FGCLEANING North Fuller baghouse exhaust damaged the paint finish on the complainant's vehicles causing an unreasonable interference with the comfortable enjoyment of life and property.
FGCLEANING - North Fuller baghouse	Rule 370(1)/MI-ROP-B2015-2013c, Part A, General Condition No. 9	Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Plant records obtained by staff on July 3, 2018, indicate that abnormal visible emissions were noted from the North Fuller/West Dostar baghouse stack during one of the two daily visible emissions checks done by the Facility. The process was shut

		down immediately and plant personnel conducted a black light test. Two bad bags were found. Waltz-Holst was then contacted to perform an internal inspection of the deflector plate. The North Fuller baghouse and three additional broken bags were found and replaced.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 6, 2018 (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: DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009. Also submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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 the complaint investigation. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane  
Senior Environmental Quality Analyst  
Air Quality Division  
269-567-3547

RIL:CF

cc: Mr. Dan Plant, Metal Technologies, Inc.  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Mary Douglas, DEQ