

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE



DAN WYANT DIRECTOR

October 14, 2013

Mr. Paul Bujalski, Plant Manager Revstone Metavation, LLC – Vassar Plant 700 East Huron Avenue Vassar, MI 48768

SRN: B2043, Tuscola County

Dear Mr. Bujalski:

## **VIOLATION NOTICE**

On July 23 and 24, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), observed testing of emissions conducted at the Revstone Metavation Vassar Foundry located at 700 East Huron Avenue, Vassar, Michigan. The purpose of the emission testing was to determine 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) MI-ROP-B2043-2009a.

During the emission testing, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Metal casting cooling area	Source-Wide Conditions B.I. opacity limit 20%.	Opacity >20% from cooling area roof vents.

Enclosed are copies of the instantaneous and six-minute average readings taken by AQD staff at Revstone Metavation – LLC Vassar Plant on July 24, 2013. The opacity ranged from 25% - 45% with a six-minute average of 33%. In addition, non- EPA Method 9 observations and photos taken by AQD staff further indicate exceedances of opacity limitations

On July 24, 2013, Revstone Metavation staff discussed the opacity issues. The facility has begun exploring possible additional controls. An engineering evaluation and review of proposed options will be necessary. Employees will be trained to check and assure doors or other openings are closed during periods when metal castings are cooling.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 4, 2013. 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.

If Revstone Metavation believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

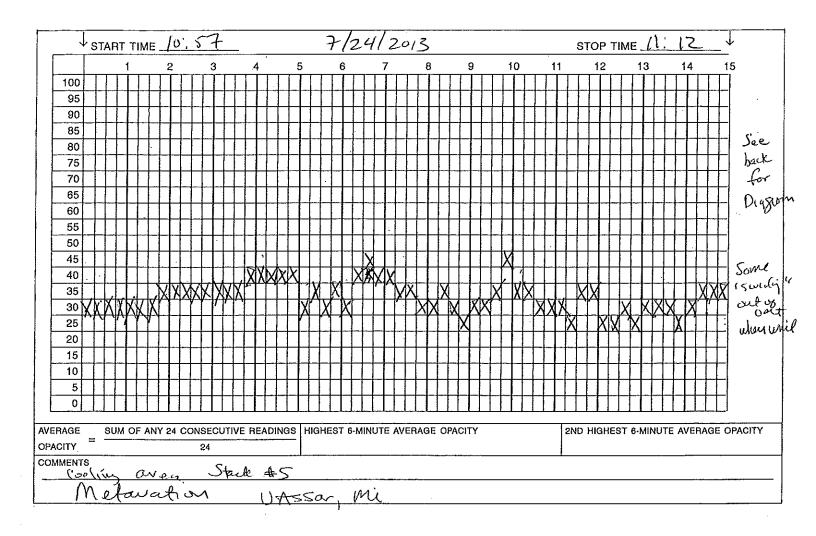
Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during the emission testing. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

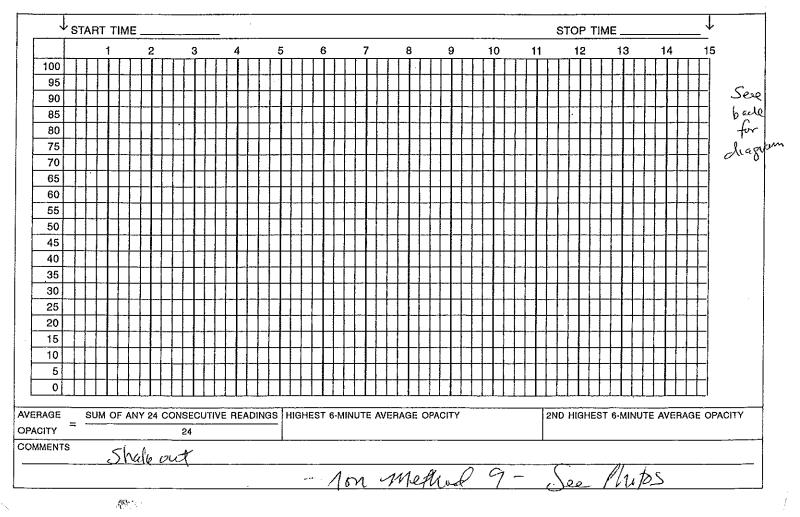
Sincerely,

Kath & Been

Kathy L. Brewer Environmental Quality Analyst Air Quality Division 989-894-6214

KLB/jd Enclosure cc: Mr. Chris Hare, DEQ cc/via email: Ms. Stacy Greene, Revstone/Metavation Ms. Lynn Fiedler, DEQ Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ Mr. Eric Grinstern, DEQ





Time (sec/mins)	Opacity %	24 consecutive value avg	Highest 6 min avg	2nd highest min avg			Largest to smallest
15	30	34.16666667	36.45833				36.45833
30	30	34.166666667	00110000				36.25
45	30					<u> </u>	36.25
1		35.20833333		[			36.04167
15	30	35.625					36.04167
30	30	36.04166667		1			36.04167
45	30	36.25		1 1		[	35.83333
2	35	36.45833333					35.62
15	35	36.25					35.41667
30	35	36.04166667					35.2083
45	35	36.04166667					35.2083
3	35	35.83333333					35.20833
15	35	35.41666667					35
30	35	35.20833333				1	35
45	35	35					35
4	40	35					34.79167
15	40	35.20833333					34.58333
30	40	35					34.375
45	40	34.79166667					34.16667
5	40	34.375					34.16667
15	30	33.95833333					33.95833
30	35	33.95833333					33.95833
45	30	33.54166667					33.75
6	35	33.75					33.75
15	30	33.75					33.54167
30	40	33.54166667				-	33.5416
45	45	32.91666667					32.91667
7	40	32.29166667					32.29167
15	40	31.666666667					31.66667
30	35	31.25					31,25
45	35	31.04166667					31.04167
8	30	30.83333333					30.83333
15	30	30.625					30.83333
30	35	30.625			_		30.625
45	30	30.625			_ <b> </b>		30.625
9	25	30.83333333					30.625
15	30						
30	30						
45	35						
10	45						
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## Metavation 7-24-2013 Cooling Exhaust #5 Opacity readings Source: K. Brewer MDEQ