



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 30, 2015

CERTIFIED MAIL - 7010 0290 0000 3734 2484
RETURN RECEIPT REQUESTED

Mr. Douglas McDonald, Plant Manager
OmniSource Corporation
711 Lewis Street
Jackson, Michigan 49204

SRN: B2281, Jackson County

Dear Mr. McDonald:

VIOLATION NOTICE

On August 4, 2015 and September 10, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of OmniSource Corporation (OSC) located at 701 Lewis Street, Jackson, Michigan. The purpose of this inspection was to determine OSC'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; the conditions of Permit to Install (PTI) number 93-04A; and to investigate a recent complaint which we received on June 26, 2015, regarding foul odors attributed to OSC's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-SHREDDERAPC	Permit to Install (PTI) No. 93-04A Special Condition 2.3	Failure to maintain and to provide a copy of the Malfunction Abatement Plan (MAP).
FG-SHREDDERAPC	PTI No. 93-04A Special Condition 2.4	Failure to operate the venturi scrubber while EU-SHREDDER was in operation.
FG-SHREDDERAPC	PTI No. 93-04A Special Condition 2.7	Failure to maintain and to provide records of the pressure drop and liquid flow rate for the venturi scrubber from August 2014 through August 2015.
FG-ZBOXAPC	PTI No. 93-04A Special Condition 3.1	Failure to maintain and to provide a copy of the Malfunction Abatement Plan (MAP).

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 21, 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.

During the inspection, AQD staff observed excessive smoke generated by the onsite portable torching operation. In discussions with you and internal AQD staff responsible for the OmniSource Bay City facility, it is apparent that you are aware of the Best Management Practices (BMP) to control torching emissions. We strongly advise OSC to implement measures to ensure compliance with PTI No. 93-04A, General Condition 11. Please include with your written response, what measures OSC will implement to ensure compliance with PTI No. 93-04A General Condition 11. Be advised that future inspections may be conducted to evaluate and determine OSC's compliance status with PTI No. 93-04A, General Condition 11.

The AQD staff, also observed during the inspection, a need to improve the control of fugitive dust emissions from the south side storage/processing area of the facility, per Appendix A of PTI No. 93-04A. Please include with your written response what steps OSC will take to better address fugitive emissions from this area of the facility. The OSC may want to consider adding a daily, facility-wide fugitive dust observation task to the applicable sections of your Appendix A, Fugitive Dust Control Plan and Waste Management Plan. Be advised to also have appropriate response measures to address fugitive dust observations or concerns.

If OSC 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 OSC. If you have any

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questions regarding the violations, or the action necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michael M. Gabor
Environmental Quality Analyst
Air Quality Division
(517) 780-5496

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Mr. Dave Centeno, OSC

Mr. Kevin Gross, OSC

Ms. Tiffany Myers, DEQ

Mr. Ken Mroczkowski, DEQ

Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ