



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT  
DIRECTOR

October 15, 2015

Mr. Kevin Barrickman  
Wolverine Bronze Company  
28178 Hayes Road  
Roseville, Michigan 48066

SRN: B5635, Macomb County

Dear Mr. Barrickman:

**VIOLATION NOTICE**

On September 15, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Wolverine Bronze Company, located at 28178 Hayes Road, Roseville, Michigan. The purpose of this inspection was to determine Wolverine Bronze Company'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; and the conditions of Permit to Install (PTI) numbers 262-77, 896-79, 806-90, 114-95A and 164-11.

During the inspection staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
<u>Plant 2</u>  Low Pressure Aluminum Furnaces #1 & #2 (1,200 lb. capacity each)  Electric Induction Aluminum Furnaces #5, #6, #7 & #8 (2,500 lb. capacity each)	Rule 336.1201	Failure to obtain Permit to Install prior to installation and operation.
<u>Plant 3</u>  Reverberatory Furnaces (1) 18,000 lb. capacity (1) 13,000 lb. capacity		

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During this inspection, it was determined that Wolverine Bronze Company had installed and operated eight (8) aluminum melting furnaces prior to obtaining Permits to Install; this is a violation of Act 451, Rule 201. It was noted that Wolverine Bronze is utilizing Rule 290 to exempt the eight (8) aluminum melting furnaces from the requirement to obtain a permit to install. However, since these furnaces are or have melted aluminum alloys with MSDSs that list either nickel and/or beryllium as components, Rule 290 is not applicable. The IRSLS for nickel and beryllium are below the allowed level for Rule 290 exemption.

A program for compliance may include completed Permit to Install applications for the eight (8) aluminum melting furnaces. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml#AUP](http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP)

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Additionally, review of the records provided by Wolverine Bronze to demonstrating Rule 290 exemption for the ladle and furnace flux emissions show that an emission factor was used that does not match the method of fluxing utilized or the composition of flux used by the facility. Please recalculate and provide records estimating emissions from fluxing utilizing an emission factor that accounts for the method and type of flux used in order to verify that Rule 290 is appropriate.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 3, 2015 (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.

If Wolverine Bronze Company 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to us during our inspection of Wolverine Bronze Company. 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 black ink, appearing to read "Eric Grinstern", with a long, sweeping flourish extending to the right.

Eric Grinstern  
Environmental Quality Specialist  
Air Quality Division  
616-356-0266

Enclosure

cc: Mr. Chris Ethridge, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Francisco Lim, DEQ