



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 11, 2022

Greg Zang, VP of Operations
Flat Rock Metal, Inc.
26601 W Huron River Drive
Flat Rock, Michigan 48134

SRN: M4768, Wayne County

Dear Greg Zang:

VIOLATION NOTICE

On August 17, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Flat Rock Metal located at 26601 W Huron River Drive, Flat Rock, Michigan. The purpose of this inspection was to determine Flat Rock Metal's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Michigan Air Pollution Control Rules; and the conditions of Permits to Install (PTI) numbers 71-98 and 59-09. Subsequently, the AQD requested further information from Flat Rock Metal and Flat Rock Metal's responses were received on August 31, 2021, and April 21, 2022.

From this inspection and from the additional follow-up with the facility, including a Rule 278a demonstration, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Stationary source	Rule 210(4)	Facility did not submit a timely application for a renewable operating permit. The facility became a Title V major source upon the installation of EUROUGHLINE3 in March of 2018.
EUROUGHLINE3 - Dry grinding line with belt grinder heads for polishing steel sheets. Exhaust is controlled by a water spray type wet dust collector. Installed in March of 2018.	Rule 201(1)	Flat Rock Metal provided a determination that EUROUGHLINE3 is exempt under Rule 285(2)(l)(vi)(C). AQD does not consider this exemption appropriate because the control is a water spray type wet dust collector; not a fabric filter as indicated in the exemption.

FGROUGHLINES in PTI 71-98 - Two dry grinding lines with belt grinder heads for polishing steel sheets. Exhausts are controlled by water spray type wet dust collectors.	Rule 201(1)	Rough line control equipment appears to have been modified from using two water spray type wet dust collectors per line to one water spray type wet dust collector per line.
---	-------------	--

Regarding the first item in the table above: according to the Michigan Air Emissions Reporting System, EUROUGHLINE3 was installed in March of 2018. During the inspection on August 17, 2021, Flat Rock Metal provided a determination that EUROUGHLINE3 is exempt from obtaining a Permit to Install per Rule 285(2)(l)(vi)(C). This exemption is for surface grinding of metals where external emissions are controlled by a fabric filter that, for all specified operations with metal, is preceded by a mechanical precleaner. The determination included a demonstration that the equipment did not have actual emissions greater than Rule 119(e) significance levels. Thus, the equipment was not precluded from using an exemption under Rule 278(1)(b).

On August 31, 2021, Flat Rock Metal further demonstrated that the potential to emit of EUROUGHLINE3 is below new source review major source thresholds. This meant the equipment was not precluded from using an exemption due to Rule 278(1)(a). However, the potential to emit of EUROUGHLINE3 is greater than 100 tons per year of PM 10 and PM 2.5.¹ Therefore, upon the installation of EUROUGHLINE3, the facility became a Title V major source per Rules 211(1)(a)(ii)(E) and (F).

Within 12 months of commencing operation as a Title V major source, a stationary source is required to apply for a renewable operating permit (ROP), per Rule 210(4). AQD has not received an ROP application from Flat Rock Metal.

Regarding the second item in the above table: AQD does not consider that Rule 285(2)(l)(vi)(C) is an appropriate exemption for EUROUGHLINE3. Rule 285(2)(l)(vi)(C) is for "Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner." EUROUGHLINE3 is controlled by a water spray type wet dust collector; not a fabric filter as indicated in Rule 285(2)(l)(vi)(C). Unless another exemption is applicable, the construction of EUROUGHLINE3 requires a Permit to Install under Rule 201(1). 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.

¹ EUROUGHLINE3 emissions are controlled with a water spray type wet dust collector. Potential to emit only considers air pollution control equipment as part of the equipment's design if this physical limit is legally enforceable, per the definition of Potential to Emit in Rule 116(n).

Greg Zang, Flat Rock Metal, Inc.

Page 3

May 11, 2022

Regarding the third item in the above table: during the inspection on August 17, 2021, Flat Rock Metal explained that FGROUGHLINES are each controlled by one water type spray wet dust collector. The lines were permitted under PTI No. 71-98 with two water type spray wet dust collectors each. Unless exempt, this modification of control equipment used in FGROUGHLINES requires a Permit to Install per Rule 201(1).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 1, 2022 (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 EGLE, AQD, Detroit District, at Cadillac Place, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202-6058 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Flat Rock Metal 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 Flat Rock Metal. 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,



Sam Liveson
Senior Environmental Engineer
Air Quality Division
313-405-1357

cc: Ben Lemley, TRC
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE