



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

July 11, 2017

Mr. David Campbell  
Simonds International  
120 East Pere Marquette Street  
Big Rapids, Michigan 49307

SRN: N3060, Mecosta County

Dear Mr. Campbell:

**VIOLATION NOTICE**

On June 21, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Simonds International located at 120 East Pere Marquette Street, Big Rapids, Michigan. The purpose of this inspection was to determine Simonds International'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); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Hardening, tempering and quench oil of knives emitted to the outside air.	Rule 201	No permit to install for the operation of knife hardening with oil quenching equipment that vents to the outside air. The quench oil is used on approximately 20% of the knives.
Hardening and tempering of blades emitted to the outside air. The quench oil station does not directly vent outside.	Rule 201	No permit to install for the operation of blade hardening with oil quenching equipment that vents to the outside air. The blades are quenched in oil prior to tempering, which is externally vented.

During this inspection, it was noted that Simonds International had commenced operation of unpermitted equipment at this facility. The AQD staff advised Simonds International on June 21, 2017, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the quench oil and tempering process equipment. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right hand side of the page)

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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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 1, 2017 (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 Simonds International 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 Simonds International. 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,



Tyler Salamasick  
Environmental Quality Analyst  
Air Quality Division  
616-356-0239

cc: Ms. Heidi Hollenbach, DEQ  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ