



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

April 12, 2017

CERTIFIED MAIL – 7016 1370 0001 4688 0552
RETURN RECEIPT REQUESTED

Mr. Ryan Penterics
Ervin Technologies
200 Industrial Drive
Tecumseh, Michigan 49286

SRN: N3246, Lenawee County

Dear Mr. Penterics:

VIOLATION NOTICE

On February 23, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ervin Technologies (Company) located at 200 Industrial Drive, Tecumseh, Michigan. The purpose of this inspection was to determine the 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 Air Pollution Control Rules, and Permit to Install (PTI) 954-91.

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two 3-ton capacity induction furnaces that melt high alloy steel to produce bullet shot. Approximately 3600 tons of metal was melted in 2016 which includes as much as 600 tons of chromium and 250 tons of nickel.	PTI 954-91 Special Condition #18, and Rule 201.	Furnace melts are heated to above 3000 degrees F. and contain up to 18% chromium and 8% nickel. These toxic materials were not previously described in the PTI application for 954-91. Chromium oxides, hexavalent chromium, and nickel air emissions are likely occurring from these processes and are not being fully captured by the dust collector. These emissions represent a

		meaningful change in the emissions of air contaminants and require a new PTI.
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During this inspection, it was noted that the Company had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised the Company on February 23, 2017, that this could be a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the induction melt furnaces. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

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 violation and submit a written response to this Violation Notice by May 3, 2017 . 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.

Furthermore, please investigate the main baghouse dust collector that controls the melt furnaces to determine the reasons for the frequent plugging of the collector which is causing weekly bag replacement and possibly impairing collector efficiency. Include the results of this investigation in your written response and propose a possible solution.

If the 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.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of this Company. 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,



Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-780-5496

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