

# SPECIALTY STEEL TREATING, INC.

File Man N6650

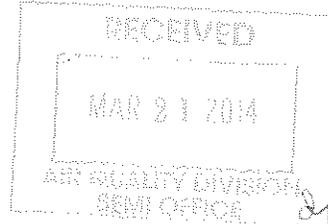
31610 W. Eight Mile Rd.  
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(248) 478-5900  
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E-file: N6650-RVN-20140318

MI Department of Environmental Quality  
Southeast Michigan District Office  
Air Quality Division  
27700 Donald Court  
Warren, MI 48092-2793

March 18, 2014 20140318

Attn: Iranna Konanahalli ✓  
Senior Environmental Engineer



CJE

Dear Mr. Konanahalli:

March 4, 2014, VN Response Letter

I am writing in response to the Violation Notice issued on March 4, 2014 to Specialty Steel Treating, Inc. (SRN: N6650) located in Farmington Hills, Michigan. The violation notice was issued following a DEQ inspection conducted at our facility on February 25, 2014. The Violation Notice stated that SST was not maintaining quench oil usage records and emissions calculations on a permit-specific basis per the requirements of our existing air permits (PTI Nos. 71-10, 263-07, 162-04, 23-04, and 247-99).

In the past, SST maintained oil usage records and prepared emissions calculations on a total plant basis in lieu of an individual equipment (permit) basis because this simplified our recordkeeping process and resulted in conservative emission estimates since all plant processes were included. Our proposed corrective action to address the violations noted and prevent reoccurrence is to submit an application to consolidate all existing permits into a single permit with facility-wide limits that covers all plant equipment requiring an air permit. This permitting strategy will allow us to maintain a simplified recordkeeping and emissions calculations process. We are requesting a submittal date for a consolidated permit application of April 25, 2014. This will allow us time to prepare the required permit application documentation. If SST is unable to obtain the permit, it will keep the quench oil usage emission calculations and records on a permit-specific basis.

Iranna, thank you for your assistance with this project and if you have any questions concerning our proposed corrective action plan, please contact me.

Best regards,

*Scott Verhelle*

Scott Verhelle  
Executive Vice President  
Specialty Steel Treating, Inc.