



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 4, 2014

Mr. Scott T. Verhelle, Executive VP
Specialty Steel Treating, Inc.
31610 West Eight Mile Road
Farmington Hills, Michigan 48336-5207

SRN: N6650, Oakland (63) County

Dear Mr. Verhelle:

VIOLATION NOTICE

On February 25, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Specialty Steel Treating, Inc. ("Specialty Steel") located at 31610 West 8 Mile Road, Farmington Hills, Michigan. The purpose of this inspection was to determine Specialty Steel'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 71-10, 263-07, 162-04, 23-04 & 247-99.

During the February 25, 2014, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Entire Specialty Steel Treating facility consisting of both batch and continuous heat treating lines: Hardening (1500-1725 °F), Quenching (150-170 °F), Water Wash to recover oil using oil skimmers (150-170 °F), Tempering (300-800 °F).	PTI Nos. 71-10 (Special Condition [SC] II & VI & Appendix A), 263-07 (SC 1.2, 1.3, 1.4, 1.5 & Appendix I), 162-04 (SC 1.2 & 1.3), 23-04 (SC 1.2 & 1.3) and 247-99 (SC 2 & 3)	Specialty Steel failed to keep net quench oil usage records and perform emissions calculations by the 15 th of each month for data pertaining to the previous month. ⁶

⁶ Specialty Steel has data (and not properly tabulated records) for quench oil purchases and Resource Conservation and Recovery Act (RCRA) Manifests on a facility-wide basis. The permits require record-keeping of net quench oil usage and emissions calculations for each permit basis. The existing data will not allow the company to calculate emissions nor will it allow the quench oil usage determination for each permit. The record-keeping and emissions calculations have not been done for the past several years. As a result, the company is able to show compliance with neither usage nor emission limits. Specialty steel may consolidate the permits into a single permit with facility-wide limits so that simplified record-keeping and emissions calculations can be accomplished.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 24, 2014 (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 Specialty Steel 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 Specialty Steel. 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,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-753-3741 or konanahalli@michigan.gov

ISK/DAC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ