



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

March 3, 2016

Mr. Stephen R. Hynes, President
Heat Treating Services Corporation of America
217 Central Avenue
Pontiac, Michigan 48341-2924

SRN: N7096, Oakland County

Dear Mr. Hynes:

VIOLATION NOTICE

On February 19, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Heat Treating Services Corporation of America ("Heat Treating") located at 217 Central Avenue, Pontiac, Michigan. The purpose of this inspection was to determine Heat Treating'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) number 176-01B dated October 30, 2013.

During the February 19, 2016, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Heat treating process line Nos. 1, 2, 4, 5, 8 (hardening, oil quenching, tempering) FG-HEATTREAT (EU-HEATTREAT1, EU-HEATTREAT2, EU-HEATTREAT4, EU-HEATTREAT5, EU-HEATTREAT8) Line Nos. 3 and 7 are not part of the permit because the lines do not have oil quench tanks.	Permit to Install No. 176-01B, Special Condition Nos. FG-HEATTREAT, I.1 limit: 21.1 tpy VOC and FG-HEATTREAT, II.1 limit: 30,000 tpy metal processed	During February 2014 through January 2016, Heat Treating exceeded both metals processed and VOC limits. ^A
Heat treating process line Nos. 1, 2, 4, 5, 8 (hardening, oil quenching, tempering) FG-HEATTREAT	FG-HEATTREAT, VI.2.d and e: VOC calculations	Heat Treating failed to perform the required calculations on a monthly basis, although metals processed data is available.

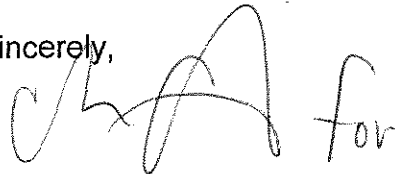
^A During the above period, Heat Treating processed the metals, in the above heat treating lines, in the range of 84,835,991 (42,418 tpy) to 89,928,591 (44,964 tpy) pounds per year, each calendar month. The metals processed exceeded the permit limit (PTI No.176-01B, FG-HEATTREAT, II.1 limit: 30,000 tpy metals processed). Based upon December 6, 2012, stack test, VOC emission factor is 1.41 pounds of VOC per ton of metal processed. The factor is incorporated into the permit (PTI No.176-01B, FG-HEATTREAT, VI.2.c). Based upon this factor, each month for the period in question, VOC emissions ranged from 30 to 32 tons per year. Hence, VOC emissions also exceeded the permit limit (FG-HEATTREAT, I.1 limit: 21.1 tpy VOC).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 24, 2016 (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 Heat Treating 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. 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,

A handwritten signature in black ink, appearing to read 'Iranna Konanahalli', followed by the word 'for' in a cursive script.

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

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