



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

August 9, 2021

Mr. Michael Hall  
Stelmi America, Inc.  
1601 Brooks Drive  
Marshall, Michigan 49068

SRN: N7166, Calhoun County

Dear Mr. Hall:

**VIOLATION NOTICE**

On May 11-12, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed stack testing at Stelmi America, Inc. located at 1601 Brooks Drive, Marshall, Michigan. The purpose of this stack testing was to determine the Facility's compliance with the conditions of Permit to Install (PTI) number 67-15A; and 40 CFR Part 63, Subpart A and Subpart N for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

The stack test results showed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCHROME1	PTI No. 67-15A Special Condition (SC) I.1, 40 CFR 63.341(c)(2)(vi), and 40 CFR 63.344(e)(2).	The facility completed testing on May 11-12, 2021 on FGCHROME1 to show compliance with the total chromium emission limit of 0.006 mg/dscm. This emission limit was established under NESHAP 40 CFR Part 63, Subparts A and N for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. Test results show the facility emitted 0.008 mg/dscm of total chromium during testing.

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium

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Electroplating and Chromium Anodizing Tanks. These standards are found in 40 CFR Part 63, Subpart N. The reported test result of 0.008 mg/dscm total chromium emitted, which is an average of three 2-hour test runs, is an exceedance of the emission limit of 0.006 mg/dscm contained in PTI 67-15A established under NESHAP 40 CFR Part 63 Subparts A and N.

Testing results show that Run #1 had a chromium emission concentration of 0.0016 mg/dscm. Runs #2 and #3 had chromium emission concentrations of 0.004 mg/dscm resulting in an average of three runs of 0.008 mg/dscm of total chromium. The EGLE Technical Programs Unit (TPU) evaluated the data submitted to the department and determined that Run #1 was a valid run.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 30, 2021 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Abode Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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.

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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my observation of the stack testing at Stelmi America, Inc. 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,

A handwritten signature in dark red ink that reads "Amanda Chapel". The signature is written in a cursive style with a large, prominent initial 'A'.

Amanda Chapel  
Senior Environmental Quality Analyst  
Air Quality Division  
269-910-2109

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Rex Lane, EGLE