



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

June 15, 2016

Mr. Dean Teeples
Formtech Industries LLC
18450 15 Mile Road
Fraser, Michigan 48026

SRN: N7263, Macomb County

Dear Mr. Teeples:

SUBJECT: Incomplete Compliance Plan

On March 30, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Formtech Industries LLC (Formtech), located at 18450 15 Mile Road, Fraser, Michigan. The purpose of the inspection was to determine Formtech's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and to investigate a recent complaint that the DEQ, AQD, received on March 29, 2016, regarding fugitive dust attributed to Formtech operations.

On May 5, 2016, the AQD sent Formtech a Violation Notice citing violations discovered as a result of the inspection and requested Formtech's written response by May 26, 2016. Formtech's response letter was received on May 26, 2016. Upon review of Formtech's letter, the AQD determined the response to the Violation Notice was inadequate and did not provide a corrective action plan to address the observed violations.

Formtech's letter indicates that the Coining Cell Manufacturing Line was not operating during my inspection and, therefore, could not be the source of the observed particulate fallout. I agree that the manufacturing line was not in operation during my inspection; however, the cited violations (Rule 901 and Rule 910) are in reference to the fact that during my inspection, I observed two large piles of metallic powder on the ground directly under the baghouse exhaust, significant amounts of rust particles in the surrounding soil and on the ledges of the building nearest the baghouse, as well as red dust on cars in the neighboring parking lot. Formtech staff also indicated during my inspection that there were issues "with steel particulate matter escaping from their baghouse.*" In addition, the report you provided from Atwell documents magnesium and iron were found in your ventilation system and in high concentrations outside of the baghouse.

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My observations during the March 30, 2016, inspection and Atwell's report indicate the baghouse associated with the Coining Cell Manufacturing Line was not operating properly and/or maintained properly.

**Complaint Investigation Report 3/30/16 – Tyler Salamasick – MDEQ Air Quality Inspector*

Based on our conversations, Formtech believes this process is exempt from obtaining an air permit to install; it appears Formtech is utilizing Rule 285(l)(vi)(c).

Rule 285(l)(vi)(C) states:

The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(l) The following equipment and any exhaust system or collector exclusively serving the equipment:

(vi) Equipment used for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following:

(C) Equipment has externally vented emissions controlled by an appropriately designed and operating fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

Rule 278a states:

(1) To be eligible for a specific exemption listed in R 336.1280 through R 336.1290, any person owning or operating an exempt process or exempt process equipment shall be able to provide information demonstrating the applicability of the exemption. The demonstration shall be provided within 30 days of a written request from the department. The demonstration may include the following information:

(a) A description of the exempt process or process equipment, including the date of installation.

(b) The specific exemption being used by the process or process equipment.

(c) An analysis demonstrating that R 336.1278 does not apply to the process or process equipment.

(2) The records required by this rule shall be provided in addition to any other records required within a specific exemption.

Please provide the appropriate documentation demonstrating the applicability of Rule 285(l)(vi)(c). In addition to the exemption demonstration, provide any records demonstrating proper operation of the baghouse with attached mechanical pre-cleaner. At a minimum, these records should include: details of the mechanical pre-cleaner design, maintenance records for the baghouse, records of the baghouse work (replacement filters) performed by Ingersoll Mechanical, and if a pressure drop gauge was installed, and the records of the installation and operating parameters of the pressure drop gauge.

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If Formtech is unable to provide evidence of an adequate mechanical pre-cleaner and appropriate operation of the currently installed baghouse, Formtech may be in violation of R 336.1201.

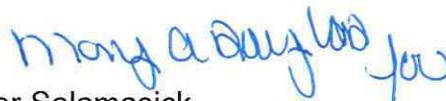
In addition to the information requested above, please provide a corrective action plan, including the dates actions will be completed, to address the piles of metallic particles and dust observed on-site during my inspection. The material must be appropriately cleaned up to prevent fugitive dust emissions from leaving your property. The corrective action plan must also indicate how Formtech will properly remove the barrels of collected metal particulate in order to prevent spills while it is being handled. In addition, include a preventative maintenance plan for the baghouse associated with Coining Cell Manufacturing line.

Formtech should immediately initiate the appropriate actions to correct the cited violations. Please be advised that failure to respond in writing and identifying actions Formtech will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide the information listed above and requested in Violation Notice letter (enclosed) by June 29, 2016, which corresponds to 14 days from the date of this letter.

Be further advised that issuance of this letter and the Violation Notice issued on May 5, 2016, does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Formtech into compliance, please contact me at the telephone number listed below.

Sincerely,



Tyler Salamasick
Environmental Quality Analyst
Air Quality Division
568-753-3842

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ