



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

March 23, 2018

Mr. Fred Smith, Plant Manager  
Kreher Wire Processing, Inc.  
34822 Goddard Road  
Romulus, MI 48174

SRN: N7836, Wayne County

Dear Mr. Smith:

**VIOLATION NOTICE**

On March 7, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Kreher Wire Processing, Inc. located at 34822 Goddard Road, Romulus, Michigan. The purpose of this inspection was to determine Kreher Wire Processing, Inc.'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 224-07.

Based on the inspection and records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPICKLINE	Permit to Install 224-07, Special Condition 1.4	The operation and maintenance plan for the caustic packed bed wet scrubber has not been implemented and maintained while operating EUPICKLINE.
EUPICKLINE	Permit to Install 224-07, Special Condition 1.5	The caustic packed bed wet scrubber has not been installed, maintained, and operated in a satisfactory manner while operating EUPICKLINE.  Satisfactory manner includes adhering to the operating guidelines listed in Appendix A of PTI 224-07.

PTI No. 224-07, Special Condition 1.4 requires the facility to implement and maintain an Operation and Maintenance (O&M) Plan for the caustic packed bed wet scrubber while operating EUPICKLINE. An O&M plan was submitted in March 2013. It requires periodic maintenance activities and associated recordkeeping and daily recordkeeping of the scrubber caustic solution flow rate and other scrubber operational conditions. Kreher Wire Processing was unable to produce records demonstrating that all of these maintenance activities have been conducted. Additionally, records of scrubber operating conditions, such as daily caustic solution flow rate, have not been maintained. This is a failure to implement and maintain the O&M plan.

PTI No. 224-07, Special Condition 1.5 requires the facility to install, maintain, and operate the caustic packed bed wet scrubber in a satisfactory manner. A satisfactory manner includes adhering to all of the operating guidelines in Appendix A. Appendix A requires, in part, the facility to maintain the pressure drop across the scrubber per the manufacturers specifications, maintain a pressure differential indicator, and maintain the caustic solution flow rate at or above a minimum of 400 gallons per minute (gpm). During the inspection, it was noted that there was no pressure differential monitor installed, and the caustic solution flow rate was below the 400 gpm minimum. This is a failure to install, maintain, and operate the scrubber in a satisfactory manner.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 13, 2018 (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 recurrence.

If Kreher Wire Processing 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 violations cited above. 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,



Katie Koster  
Senior Environmental Engineer  
Air Quality Division  
313-456-4678

cc via email: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ