



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 25, 2014

Mr. Scott Bucholtz, Plant Manager
Magnacheck
32701 Edward Avenue
Madison Heights, MI 48071

SRN: P0548, Macomb County

Dear Mr. Bucholtz:

VIOLATION NOTICE

On September 18, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of your facility located at 2125 Riggs Avenue, Warren, Michigan. The purpose of this inspection was to determine your facility'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 to investigate a recent complaint which we received on September 15, 2014, regarding fugitive dust fallout attributed to your facility's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Metal shotblasting processes ducted into a fabric filter collector system exhausted outdoor	AQD Administrative Rules: 1. R 336.1201	Installing and operating process equipment without first obtaining a permit to install. Installing and operating process equipment that has externally vented emissions controlled by an inappropriately designed and operated fabric filter collector system for operations with metal and was not preceded by a mechanical precleaner.

During the inspection, it was noted that Magnacheck had installed and/or commenced operation of unpermitted process/control equipment (5 shotblast equipment with single fabric filter emission control system) at this facility. The AQD staff advised Mr. Bucholtz on September 23, 2014, that the fabric filter collector exhaust was inappropriately designed and the filter system was not preceded by a mechanical precleaner. These findings did not meet AQD Administrative Rule R 336.1285(l)(vi)(C) exemption from

permit to install requirements. Thus, the process/control equipment is a violation of Act 451, Administrative Rule R 336.1201 (Rule 201).

A program for compliance may include a completed PTI application for the 5 shotblast equipment with single fabric filter emission control system. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP


Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 16 (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 Magnacheck 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 the facility. 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,


Remilando Pinga
Senior Environmental Engineer
Air Quality Division
586-753-3744

RP/DC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ