



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE

EGLE
LIESL EICHLER CLARK
DIRECTOR

March 3, 2021

Mr. Ellsworth Miller, President and CEO
Ellsworth Cutting Tools
25190 Terra Industrial Drive
New Baltimore, MI 48051

SRN: P1172, Macomb County

Dear Mr. Miller:

VIOLATION NOTICE

On December 22, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Ellsworth Cutting Tools located at 25190 Terra Industrial Drive, New Baltimore, Michigan. The purpose of this inspection was to determine Ellsworth Cutting Tools 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 Air Pollution Control Rules; and to investigate a recent complaint which we received on November 24, 2020, regarding fugitive dust attributed to Ellsworth Cutting Tools operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
10 Metal Grinding Stations controlled solely by 2 mechanical pre-cleaner dust collectors	Rule 201	10 Metal Grinding Stations were operated without a permit to install.
10 Metal Grinding Stations controlled solely by 2 mechanical pre-cleaner dust collectors	Rule 901	EGLE laboratory analysis indicates that Ellsworth Cutting Tools is the source of significant particulate fallout at a neighboring property.

During this inspection it was noted that Ellsworth Cutting Tools had installed and commenced operation of externally vented metal grinding equipment, controlled only by a mechanical pre-cleaner, without obtaining a permit to install. The AQD staff advised Ellsworth Cutting Tools on December 22, 2020, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

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A program for compliance may include a completed PTI application for the grinding process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that, per Rule 285(2)(l)(vi), the requirement of Rule 201(1) to obtain a permit to install does not apply to equipment used for the surface grinding of metals that have externally vented emissions controlled by an appropriately designed and operated fabric filter collector that is preceded by a mechanical pre-cleaner and that is not excluded from exemption per Rule 278.

Prior to the inspection at Ellsworth Cutting Tools, a complaint investigation was conducted at a neighboring property. The complainant alleged that fallout from Ellsworth Cutting Tools was infiltrating their property and depositing on various surfaces. During this inspection AQD staff noticed a significant amount of fallout deposited on the complainant's property. AQD staff obtained a sample of the fallout from the complainant's property and compared it to dust collected from the cyclone dust collector hopper associated with the metal grinding operations at Ellsworth Cutting Tools. The results of this analysis showed that the fallout inside the complainant's property has very similar characteristics as the grinding dust in the hopper at Ellsworth Cutting Tools.

In the professional judgement of AQD staff, the dust fallout that was observed at the complainant's location was of sufficient intensity, frequency, and duration to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 24, 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, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ellsworth Cutting Tools 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 violation cited above and for the cooperation that was extended to me during my inspection of Ellsworth Cutting Tools.

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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 black ink that reads "Adam Bognar". The signature is written in a cursive style with a large, stylized "A" and "B".

Adam Bognar
Environmental Engineer
Air Quality Division
586-854-1517

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