



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 17, 2019

CERTIFIED LETTER – 7014 1200 0000 0987 3510

Return Receipt Requested

Mr. John Belles, Director of Facilities
Hastings Manufacturing Company
325 North Hanover Street
Hastings, Michigan 49058

SRN: A0171, Barry County

Dear Mr. Belles:

VIOLATION NOTICE

On December 4, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Hastings Manufacturing Company, located at 325 North Hanover Street, Hastings, Michigan. The purpose of this inspection was to determine Hastings Manufacturing Company'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 Air Pollution Control Rules; and Permit to Install (PTI) numbers 649-90, 222-90A, 936-93, 277-86, 810-79A, 267-81 and 396-91.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Chrome Plating Operation	Permit to Install No. 277-86, Special Condition 19 Rule 910 (R 336.1910)	Failure to properly operate the chrome scrubber control device.
(2) Electric Induction Furnaces	Rule 201 (R 336.1201)	Operating without an air use permit.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 7, 2020. 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.

Additionally, Hastings Manufacturing shall conduct air emissions performance testing on Scrubber System No. 1, which controls emissions from five (5) chrome plating tanks, and Scrubber System No. 2, which controls emissions from the ancillary tanks associated with the chrome plating operation. As detailed in letters to Hastings Manufacturing, dated May 30, 2019, September 5, 2019 (Violation Notice) and September 25, 2019 (Second Violation Notice), Hastings Manufacturing was requested to conduct testing because performance testing has not been conducted since 1998 to determine on-going compliance with the chromium emission limits established by Permit to Install (PTI) No. 277-86 and the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR Part 63, Subpart N. Additionally, testing is being required to demonstrate compliance following the facility's completion of a compliance program for the documented violation of Rule 910 cited above.

In accordance with Act 451, Section 324.5503(u), Air Pollution Control Rule 1001(c) and (f) (R 336.2001) and General Condition 18 of PTI No. 277-86, the AQD is requiring Hastings Manufacturing submit a test protocol within 45 days of receipt of this letter. The protocol shall include a proposed date for the testing, which is to be conducted no later than March 30, 2020. The test should determine the emission rate of chromium from Scrubber System No. 1 and Scrubber System No. 2. All testing must be conducted using United States Environmental Protection Agency approved test methods.

Not less than 7 days before the performance test is conducted, the AQD must be notified in writing of the actual time and place of the performance tests and who shall conduct them. Results of the performance test shall be submitted to the department in the format prescribed by the applicable reference test method within 60 days after the last date of the test.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If Hastings Manufacturing Company 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 your cooperation. 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,

A handwritten signature in cursive script, reading "Eric Grinstern".

Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-558-0616

Enclosure

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi G. Hollenbach, EGLE