



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 25, 2020

Mr. Robert Swenson, President
AmeriTi Manufacturing Company
19300 Filer
Detroit, MI 48234

SRN: A8892, Wayne County

Dear Mr. Swenson:

VIOLATION NOTICE

On December 4, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a facility inspection of AmeriTi Manufacturing Company (AmeriTi), located at 19300 Filer Avenue, Detroit, Michigan. The purpose of the inspection was to determine AmeriTi'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 the conditions of Permit to Install (PTI) number 549-97A.

As a result of the inspection and review of associated records, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
FGFURNACES	PTI 549-97A, SC III.1	The malfunction abatement plan was not followed after an instance of an out of range pressure drop reading.
	PTI 549-97A, SC IV.1	The baghouse is not maintained and operated in a satisfactory manner.
	PTI 549-97A, SC VI.2	The records of all inspections and maintenance performed on the baghouse not maintained.

PTI 549-97A, Special Condition (SC) III. 1 requires that FGFURNACES shall not operate unless a malfunction abatement plan (MAP) as described in Rule 911(2) for the associated baghouse has been submitted within 90 days of permit issuance and is implemented and maintained. SC IV.1 requires that FGFURNACES shall not operate unless the baghouse is installed, maintained, and operated in a satisfactory manner. SC

Mr. Robert Swenson
AmeriTi Manufacturing Company
Page 2
September 25, 2020

VI.2 requires that record of all inspections and maintenance performed on the baghouse be kept.

On December 10, 2019, the pressure drop reading was 1 inch water, which is outside of the range specified in the approved MAP (2 inches to 6 inches water). The MAP specifies the following for out of range operations.

“If below the minimum acceptable gauge reading, call the Maintenance Department. Maintenance checks, as necessary, for improper operation of gauges, bag condition, excessive dust in the dust collector hopper, improper operation of dampers, improper operation of shaker cleaning system, damaged ductwork, high humidity in exhaust air. Determine what the problem is and repair it.”

In addition, within Section 2 of the MAP AmeriTi states that “If AmeriTi’s monitoring shows the APC [Air Pollution Control] operating parameter identified in this section falls outside of these operating ranges, AmeriTi will initiate reactive maintenance responses (see Section 7)” and, within Section 7, that “AmeriTi will maintain a record of the corrective ‘response actions’ taken when reactive maintenance response is required”.

Within the records provided by AmeriTi there are no maintenance activities for the out of range pressure drop reading on December 10, 2019. Therefore, the facility is not implementing and maintaining the MAP and is in violation of SC III.1. The lack of maintenance records for the out of range pressure drop is also a violation of SC VI.2.

Based on the out of range pressure drop reading, and failure to provide maintenance activities documenting repair, the baghouse is not considered to be maintained and operated in a satisfactory manner and is in violation of SC IV.1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 16, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date 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.

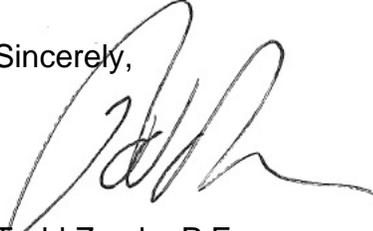
Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If AmeriTi 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.

Mr. Robert Swenson
AmeriTi Manufacturing Company
Page 3
September 25, 2020

Thank you for your attention to resolving the violation cited above. 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, appearing to read 'Todd Zynda', written over a faint circular stamp.

Todd Zynda, P.E.
Senior Environmental Engineer
Air Quality Division
313-418-7216

cc: Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE