

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY UPPER PENINSULA DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

August 6, 2018

VIA E-MAIL and U.S. MAIL

Mr. Tyler Hill, General Manager AAM-IMMF 801 South Carpenter Avenue Kingsford, Michigan 49802

SRN: B1577, Dickinson County

Dear Mr. Hill:

VIOLATION NOTICE

On January 24, 2018, and May 3, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an investigation of a complaint regarding fugitive dust/fallout attributed to AAM-IMMF (Grede LLC) operations.

Additionally, a letter dated April 17, 2018 (enclosed), was sent to Mr. Charles Kalupa, Grede LLC, returning the FY 2017 Renewable Operating Permit Report Certifications for Annual, Semi-Annual, and CAM Report Certification and Annual MAERs Submittal Certification, because they were not signed by a "Responsible Official" (RO) as defined in Rule 118(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). To date the required forms have not been resubmitted to the AQD with the M-001 Form (enclosed).

Based on the recent investigations and correspondence the AQD finds AAM-IMMF (Grede LLC) to be in violation of the following:

Process Description	Rule/Permit Condition Violated	Comments
Information request/ submittal of ROP Report Certifications	R 336.1213(1)(e); General Condition 19 of MI-ROP-B1577-2014a	Failure to provide AQD notification of a change in RO and for ROP certifications to be signed by RO.
Collection & disposal of air contaminants	R 336.1370; General Condition 9 of MI-ROP-B1577-2014a	Failure to adequately collect and dispose of air contaminants
Operation of air cleaning device	R 336.1910; General Condition 10 of MI-ROP-B1577-2014a	Failure to adequately maintain and operate an air cleaning device
Emission of air contaminant	R 336.1901(a) & (b); General Condition 12 of MI-ROP-B1577-2014a	Emission of an air contaminant that has caused injurious effects to property and/or has caused unreasonable interference with

		the comfortable enjoyment of life and property
Notification of change of ownership	R 336.1219(2); General Condition 31 of MI-ROP-B1577-2014a; Consent Order AQD No. 23- 2016 paragraph 22	Failure to notify of change of ownership or operational control of stationary source
MACT EEEEE testing	FGMACT-EEEEE Condition V.1 & V.2 of MI-ROP- B1577-2014a; Consent Order AQD No. 23- 2016 paragraph 9.C	Failure to conduct performance testing as required
Notification of purchaser to assume obligations of Consent Order	Consent Order AQD No. 23- 2016 paragraph 22	Failure to provide consent of purchaser to assume all obligations of Consent Order

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 27, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: 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.

Please submit the written response to the DEQ, AQD, Upper Peninsula District, at 1504 West Washington, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If AAM-IMMF (Grede LLC) 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. 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,

Joseph Scanlan Upper Peninsula District Air Quality Division 906-458-6405

Enclosures

cc/via e-mail: Mr. Dean Teeples, AAM Ms. Mary Ann Dolehanty, DEQ Mr. Craig Fitzner, DEQ Mr. Christopher Ethridge, DEQ Ms. Jenine Camilleri, DEQ Mr. Ed Lancaster, DEQ