

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY UPPER PENINSULA DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

November 30, 2018

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

SRN: B1577, Dickinson County

Dear Mr. Hill:

VIOLATION NOTICE

On September 18, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of AAM-IMMF (Grede LLC) located at 801 South Carpenter Avenue, Kingsford, Michigan. The purpose of this inspection was to determine 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; Permit to Install (PTI) # 186-16; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1577-2014a; and Consent Order AQD number 23-2016.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Air contaminant handling from Module Sand System to Module Torit Collector	PTI# 186-16, EU-P032 SC III.2, Rule 910 & 370	Failure to properly maintain/operate baghouse; Failure to properly handle collected air contaminants
Air contaminant handling from Module Finishing to Module Torit Collector	PTI# 186-16, EU-P034 SC III.2, Rule 910 & 370	Failure to properly maintain/operate baghouse; Failure to properly handle collected air contaminants
Air contaminant handling from Module Shakeout to Module Torit Collector	PTI# 186-16, EU-P038 SC III.2, Rule 910 & 370	Failure to properly maintain/operate baghouse; Failure to properly handle collected air contaminants

On September 18, 2018, AQD staff observed operation of the Module Sand System, Module Finishing, and Module Shakeout while the Module Torit Collector was malfunctioning. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

This also constitutes a violation of Rule 370 of the administrative rules promulgated under Act 451, which requires that collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outside air.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 20, 2018, (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 violation; 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 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 and for the cooperation that was extended to us during our inspection of Grede LLC. 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

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