



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 11, 2019

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

SRN: B1577, Dickinson County

Dear Mr. Hill:

VIOLATION NOTICE

On July 31, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), 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 AAM-IMMF'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; Permit to Install (PTI) numbers 186-16 and 65-17; 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 |
|---------------------|----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EU-P009 CUPOLA | ROP No. MI-ROP-B1577-2014a, EU-P009-CUPOLA, Special Condition (SC) I.4, & 1.5 40 CFR 63.7690(a)(2)(i) or (ii) | Failure to control emissions from the cupola furnace. Exceedance of PM and PM10 emission limits. |
| | 40 CFR 63.7710 (a) & (b) | Failure to operate pollution control equipment in a manner consistent with good air pollution control practices and according to the operation and maintenance plan. |

On July 31, 2019, AQD staff observed the cupola wet cap open while there was molten/ignited material in the cupola, during an off-blast period. Additionally, based upon information requested and provided by AAM-IMMF, during the previous 6 months, the cupola was operated with the wet cap open 160 times over 68 days for a total of 4,505 minutes. Opening the wet cap of the cupola, while it is operating, results in emissions by-passing the fabric filter collector and exceeding the particulate matter emission limit.

The cited violations are also enforceable under Exhibit A and B of Consent Order, AQD number 23-2016.

Mr. Tyler Hill
AAM-IMMF
Page 2
September 11, 2019

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 2, 2019 (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 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 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 and EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855.

If AAM-IMMF 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 me during my inspection of AAM-IMMF. 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,



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

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