



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 5, 2019

Mr. Coley Wood
Mueller Brass Company
302 Ashfield Street
Belding, Michigan 48809

SRN: B1650, Ionia County

Dear Mr. Wood:

VIOLATION NOTICE

On April 19, 2019 and April 26, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted inspections of Mueller Brass Company located at 302 Ashfield Street, Belding, Michigan. The purpose of these inspections was to determine Mueller Brass 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; the conditions of Permit to Install (PTI) number 16-11; and Consent Order AQD number 9-2011.

During the inspections, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGMELTFURN Induction Melting Furnaces No. 7 and No. 8	PTI No. 16-11, FGMELTFURN, Special Condition (SC) IV.1; Rule 910	Failure to properly maintain and operate the East Baghouse on multiple occasions.

On April 26, 2019, the AQD staff observed operation of the No. 7 Furnace while the west chamber of the East Baghouse was inoperable. It was determined that the No. 7 Furnace was operated with only one of the two chambers of the East Baghouse operational from March 22, 2019 until May 1, 2019, following a fire on March 16, 2019 that rendered the west chamber of the East Baghouse inoperable. Additionally, review of the East Baghouse pressure drop records showed that the No. 7 Furnace operated on 10 days, when one or both of the chambers of the baghouse had pressure drop readings outside of the established range for proper operation.

This constitutes a violation of PTI No. 16-11, FGMELTFURN, SC IV.1 and 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.

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The cited violations (PTI No. 16-11, FGMELTFURN, SC IV.1) are also enforceable as paragraph 9.A. of Consent Order, AQD number 9-2011.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 26, 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.

If Mueller Brass 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 the cooperation that was extended to me during my inspection of Mueller Brass Company. 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
Ms. Heidi Hollenbach, EGLE