



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

February 5, 2018

Mr. Bruce Milligan
Barber Steel Foundry Corporation
2625 West Winston Road
Rothbury, Michigan 49452

SRN: B1961, Oceana County

Dear Mr. Milligan:

VIOLATION NOTICE

On January 25, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) met with representatives of Barber Steel Foundry Corporation (BSF) to discuss emissions from the facility's foundry operations. At this meeting, BSF presented data from engineering stack tests conducted to evaluate emissions from the facility's induction furnace (EUINDUCFURNEIF6), shakeout machine (EU-SHAKEOUT) and pouring/cooling, mold making and sand handling (FG-POURCOOL). The results of the engineering stack tests showed exceedances of emission limits contained in Permit to Install (PTI) No. 12-14C. Additionally, during this meeting BSF presented the actions they have taken, and plan to take to come into compliance. While it is recognized that BSF is undertaking actions to comply with the permitted emission limits, the permitted timeframe to conduct approved emissions testing has been exceeded.

Based upon the information provided by BSF, the following air pollution violations have been identified at your facility:

Process Description	Rule/Permit Condition Violated	Comments
Electric Induction Furnace	PTI No. 12-14C, EUINDUCFURNEIF6, Special Conditions I.4 and I.5	Exceedance of the pound per hour emission limits for PM-10 and PM-2.5.
	PTI No. 12-14C, EUINDUCFURNEIF6, Special Condition V.1	Failure to conduct approved stack testing within 90 days of permit issuance.
Shakeout Machine	PTI No. 12-14C, EU-SHAKEOUT, Special Conditions I.7, I.9-I.13 and I.15	Exceedance of the pound per hour emission limits for VOC, Benzene, Cresols, Naphthalene, Phenol, Individual HAPs, Aggregate HAPs.
	PTI No. 12-14C, EU-SHAKEOUT, Special Condition V.1	Failure to conduct approved stack testing within 90 days of permit issuance.

Process Description	Rule/Permit Condition Violated	Comments
Pouring/Cooling, Mold Making and Sand Handling	PTI No. 12-14C, FG-POURCOOL, Special Conditions I.4, I.8, I.10- I.14 and I.15.	Exceedance of the pound per hour emission limits for CO, VOC, Benzene, Cresols, Naphthalene, Phenol, Individual HAPs, Aggregate HAPs.
	PTI No. 12-14C, FG-POURCOOL, Special Condition V.1	Failure to conduct approved stack testing within 90 days of permit issuance.

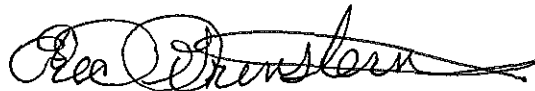
The cited Special Conditions are also enforceable under Consent Order, AQD No. 58-2013.

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

If BSF believes the above observations or statements are inaccurate or do not constitute a violation 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,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-0266

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ