



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GRETHER  
DIRECTOR

April 23, 2018

Mr. Dave Bent  
Metal Technologies, Inc.  
429 Fourth Street  
Three Rivers, Michigan 49093

SRN: B2015, St. Joseph County

Dear Mr. Bent:

**VIOLATION NOTICE**

On March 5, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Metal Technologies, Inc. (Facility), located at 429 Fourth Street, Three Rivers, Michigan. The purpose of this inspection was to investigate recent complaints that the DEQ, AQD, first received on February 28, 2018, regarding fallout damage to vehicles that were attributed to foundry operations.

On March 5, 2018, fallout samples were collected from vehicles at Charvat Agency Insurance (i.e., Samples TR-1 through TR-3) and Huddlestun Lumber Company (i.e., Samples TR-4 and TR-5) in Three Rivers, Michigan. A sample was also collected at the Facility from the dust discharge bin (i.e., Sample TRG-NF-1) for the North Fuller baghouse associated with FGCLEANING in ROP Permit No. MI-ROP-B2015-2013c. These samples were then sent to EMSL Analytical, Inc. in Salem, New Hampshire, for particulate analysis (report enclosed).

Based on the particulate analysis report results that indicates Samples TR-1 through TR-5 contained 30-85 percent rust/fume fines, ambiguous and trace shot particles compared to Sample TRG-NF-1 that contained 90 percent rust, ambiguous and trace shot particles; along with two known baghouse control issues determined during the fallout complaint investigation that coincides within the time period when the complainants noticed damage to their vehicles, staff of the DEQ, AQD, is citing the following violations:

Process Description	Rule/Permit Condition Violated	Comments
FGCLEANING - Iron castings are cleaned in shot blast machines and one stand grinder	Rule 901(b)	Particulate emissions attributed to the FGCLEANING North Fuller baghouse exhaust pitted the paint and chrome finish on complainant's vehicle causing an unreasonable interference with the comfortable enjoyment of life and property.

FGCLEANING - North Fuller Baghouse	Rule 370(1)	Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Plant records obtained by staff indicate two bags were replaced in the North Fuller baghouse on February 18, 2018, following a black light test; and following baghouse exhaust opacity being observed by plant personnel on February 27, 2018, four additional bags were replaced following a second black light test and a misaligned blow pipe was temporarily repaired. On March 4, 2018, the Facility's contractor replaced all of the bags in the North Fuller baghouse and replaced the damaged blow pipe.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 14, 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 the Facility 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 the Facility.

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If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane  
Senior Environmental Quality Analyst  
Air Quality Division  
269-567-3547

RIL:CF

Enclosure

cc: Mr. Dan Plant, Metal Technologies, Inc.  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, Field Operations Section, DEQ  
Mr. Malcolm Mead-O'Brien, DEQ  
Ms. Mary Douglas, DEQ