STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

October 14, 2013

Mr. Paul Bujalski, Plant Manager
Revstone Metavation, LLC – Vassar Plant
700 East Huron Avenue
Vassar, MI 48768

SRN: B2043, Tuscola County

Dear Mr. Bujalski:

VIOLATION NOTICE

On July 23 and 24, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), observed testing of emissions conducted at the Revstone Metavation Vassar Foundry located at 700 East Huron Avenue, Vassar, Michigan. The purpose of the emission testing 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 administrative rules and the conditions of Renewable Operating Permit (ROP) MI-ROP-B2043-2009a.

During the emission testing, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Cupola furnace	Source-Wide Conditions B.I. Opacity limit 20%.	Opacity >20% at charge area due to process feed rate changes.
Cupola furnace	Source-Wide Conditions B.I. Opacity limit 20%.	Opacity >20% due to melt down at end of day.

Enclosed are copies of the instantaneous and six-minute average readings taken by AQD staff at Revstone Metavation – LLC Vassar Plant on July 23, 2013. The opacity ranged from 5% - 85% with a six-minute average of 33%. In Addition, non-EPA Method 9 observations and photos taken by AQD staff further indicate exceedances of opacity limitations

On July 24, 2013, Revstone Metavation staff discussed the opacity issues. The scrubber is usually managed to respond to the fluctuations in the charge feed rate. However during the stack test, the facility operators did not change scrubber control parameters in an effort to maintain a constant testing condition. Immediate steps could be taken to alter the control parameters for the scrubber flow to improve control. The facility will investigate options for daily draw down procedures including changes to the blower rate.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 4, 2013. 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.

The facility should evaluate the Malfunction Abatement Plan (MAP) required by EUCUPOLA III.1. and the Operation and Maintenance Plan required by EUCUPOLA III.3. to clarify responses that operation personnel will implement to maintain cupola emission opacity below 20%.

If Revstone Metavation 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 the emission testing. 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,

Kathy L. Brewer
Environmental Quality Analyst
Air Quality Division
989-894-6214

KLB/jd
Enclosure
cc: Mr. Chris Hare, DEQ
cc/via email: Ms. Stacy Greene, Revstone/Metavation
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Eric Grinstern, DEQ

EPA
VISIBLE EMISSION OBSERVATION FORM 1

Form Number							Page	Of
Continued on VEO Form Number								

Method Used (Circle One): Method 9 | 203A | 203B | Other: _____

Company Name: Rustone Metavation Vassar			
Facility Name: Rustone Metavation Vassar			
Street Address: 700 E. Huron AVE.			
City: Vassar	State: MI	Zip: 48758	

Process: Cupola	Unit #: NA	Operating Mode: full capacity	
Control Equipment: Venteri Scrubber		Operating Mode: full capacity	

Describe Emission Point: Cupola charge Door

Fugitive emissions

Height of Emiss. Pt. Start: ~40 ft	End: ~40 ft	Height of Emiss. Pt. Rel. to Observer Start: equal	End: equal
Distance to Emiss. Pt. Start: ~15 ft	End: ~15 ft	Direction to Emiss. Pt. (Degrees) Start: 360°	End: 360°
Vertical Angle to Obs. Pt. Start: 45°	End: 45°	Direction to Obs. Pt. (Degrees) Start: 360°	End: 360°

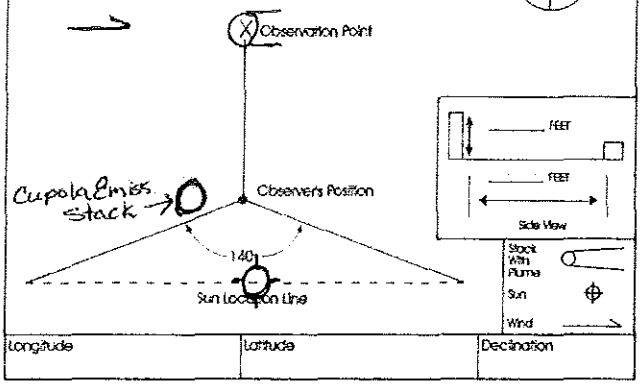
Distance and Direction to Observation Point from Emission Point: Start: ~10ft End: ~10ft

Describe Emissions: Start: Fumigating/Letting		End: Fumigating/Letting	
Emission Color: Start: blue/white	End: blue/white	Water Droplet Plume: Attached ☐ Detached ☐ None ☒	

Describe Plume Background: Start: upper cupola		End: Upper cupola	
Background Color: Start: brown	End: brown	Sky Conditions: Start: overcast	End: overcast
Wind Speed: Start: 5-10 mph	End: 5-10 mph	Wind Direction: Start: W	End: W
Ambient Temp. Start: 70	End: 70	Wet Bulb Temp.: NA	RH Percent: NA

Source Layout Sketch

Draw North Arrow: ☐ TN ☐ MN



Longitude	Latitude	Declination

Additional Information:

Observation Date	Time Zone	Start Time	End Time
July 23, 2013	Eastern	11:34 am	11:37 am

Min \ Sec	0	15	30	45	Comments
1	80	35	50	50	
2	20	40	50	45	
3	50	75	20	30	
4	80	55	20	10	
5	10	5	30	5	
6	5	10	10	10	
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Observer's Name (Print): ERIC GRINSTERN	
Observer's Signature: Eric Grinstern	Date: 7/23/2013
Organization: MDEQ-AQD	
Certified By: ETA	Date: 4/17/2013

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