

Shaffer, Adam (EGLE)

From: Daryl Mendrick <dmendrick@huroncasting.com>
Sent: Tuesday, October 11, 2022 7:52 AM
To: Shaffer, Adam (EGLE); Hare, Chris (EGLE)
Subject: Response to Staff Activity Report

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Dear Adam and Chris:

Huron Castings Inc. and Blue Diamond Steel Castings LLC are in receipt of the staff activity report dated September 30, 2022. We take this issue very seriously and greatly appreciate the professional courtesy extended to our staff during the September 13 and 14, 2022 inspection. We are concerned with the violation notice in the staff activity report regarding a failure to perform checks for visible emissions from the building and the finding of violations regarding the 5 year NESHAP melt furnace testing.

HCI/BD staff conduct a facility wide check for visible emissions on a daily basis. We conduct stack visible emissions checks monthly. Neither the daily nor the monthly checks have indicated fugitive losses from the building in excess of the 20% opacity on a six-minute average with one 30% opacity allowed in a six-minute average (40 CFR 63.10895(e)). The standard of performance for our operation is an opacity of not more than 5% and clearly we would note if opacity exceeds 20%. Regardless, and in addition to the redundancy noted, we have adjusted our opacity reading standards to include a Method 9 observation of the potential fugitive release points of the buildings every 6 months in keeping with 40 CFR 63.10895(e) requirement.

With regards to the melt furnace stack testing, we are in the process of scheduling a testing firm to perform the stack testing of a representative melt furnace system. This testing will be conducted in accordance with the NESHAP Subpart ZZZZZ testing provisions as required by 40 CFR 63.10898(b). This testing event requires the preparation and submittal of a test plan and we understand that testing companies are heavily booked as business returns to some sense of normalcy following the pandemic. As soon as possible, we will coordinate the testing with your office and communicate the final testing date.

We hope you find these responses prompt and adequate. If you have any questions or concerns, please contact me at 989-453-6500 x463.

Sincerely,

Daryl Mendrick

Huron Castings Inc. and Blue Diamond Steel Castings LLC