



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

December 22, 2022

VIA E-MAIL AND U.S. MAIL

Daryl Mendrick, EHS Director
Huron Casting, Inc and Blue Diamond Steel Casting
7050 Hartley Street
Pigeon, Michigan 48755

SRN: B7013; Huron County

Dear Daryl Mendrick:

SUBJECT: Consent Order AQD No. 4-2017, Stipulated Fines

On April 20, 2017, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), and Blue Diamond Steel Casting, LLC and Huron Casting, Inc. (Company) entered into a Stipulation for Entry of Final Order by Consent (Consent Order) AQD No. 4-2017. In a Violation Notice (VN) dated October 11, 2022, the AQD cited the Company for failing to perform timely testing per the National Emissions Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources, Title 40 of the Code of Federal Regulations, Part 63, Subpart ZZZZZ (Subpart ZZZZZ); and the conditions of Renewable Operating Permit (ROP) No. MI-ROP-B7013-2018a, including a performance test to demonstrate compliance with all applicable particulate matter (PM) emission limits and opacity tests for fugitive emissions, which are violations of the terms and conditions of the Consent Order.

Paragraph 19 of the Consent Order reads, in part:

“On and after the effective date of this Consent Order, the Company shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZZ, as they apply to the Company.”

Furthermore, Paragraph 20 of the Consent Order puts forth the following conditions:

“On and after the effective date of this Consent Order, the Company shall comply with the performance testing requirements of 40 CFR 63.10898(b) for particulate matter emission rates from the electric induction steel melting furnaces (included but not limited to the EU-SHELLFURNACE for the HC Facility) by conducting testing no less frequently than every five (5) years.”

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The AQD has determined the amount of stipulated fines to be \$30,000. After reviewing the VN and the Company's response to the violations, the AQD has determined that the Company failed to comply with the performance testing requirements. Specifically, the deadline for a Subpart ZZZZZ performance test at Huron Casting, Inc. was July 27, 2021; the deadline for a Subpart ZZZZZ performance test at Blue Diamond Steel Casting, LLC was July 7, 2022; and the deadline for the opacity test for fugitive emissions at each facility was October 2, 2018. These tests were recently performed in December 2022. Please be aware that given the length of time these violations have occurred, the AQD is using discretion and is not assessing the maximum stipulated fines for these violations under the terms of the Consent Order.

The Company is hereby requested to submit the stipulated fines of \$30,000 in accordance with the provisions of Paragraph 25 of Consent Order, by January 21, 2023. To ensure proper credit, all payments shall include the Agreement Identification No. AQD40164-S on the face of the check. Stipulated fines submitted under this Consent Order shall be made by check, payable to the "State of Michigan" and mailed to the Department of Environment, Great Lakes, and Energy, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157.

Please contact me at 517-275-0883 or MoranE@Michigan.gov if you have any questions.

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENT, GREAT
LAKES, AND ENERGY

By: 
Erin Moran
Enforcement Unit, Air Quality Division

Date: 12/22/2022

cc: Margaret Bettenhausen, Michigan Department of Attorney General
Chris Hare, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE