



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

May 30, 2018

**CERTIFIED MAIL-7010 0290 0000 3734 2835**  
**RETURN RECEIPT**

Mr. Michael Connolly  
TMS International  
1155 Business Center Drive  
Horsham, PA 19044-3454

SRN: B7061, Monroe County

Dear Mr. Michael Connolly:

**VIOLATION NOTICE**

On April 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Gerdau MacSteel Monroe (Company) located at 3000 E. Front Street, Monroe, Michigan. Co-located at this location is a steel slag handling operation that is owned/operated by TMS International. The purpose of this inspection was to determine the Company's 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) and the associated Air Pollution Control Rules and Renewable Operating Permit (ROP) MI-ROP-B7061-2016.

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Automated torch cutting machine equipped with 4 torches located outdoors in the slag handling area that was installed in 2015/2016. This process was shown to AQD staff by Gerdau representative Craig Metzger and was not operating during the inspection.	Rule 201, No Permit to Install. (PTI)	9/26/2016 AQD Staff Activity report states that TMS International was instructed to apply for a PTI permit but no PTI application was ever received. ROP renewal application for MI-ROP-B7061-2016 predated automated torch cutting machine when only portable torch cutting was being conducted. New Source Review has not been conducted on the new torch cutting machine. A

		previously existing PTI permit exemption for portable torch cutting was never applicable to this automated torch cutting machine.
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 20, 2018. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Company 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 violation cited above and for the cooperation that was extended to me during my inspection of this Company. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Mike Kovalchick  
Senior Environmental Engineer  
Air Quality Division  
517-416-5025

cc: Mr. Scott Miller, DEQ  
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Malcolm Mead-O'Brien, DEQ  
Mr. Craig Metzger, Gerdau  
Ms. Jenine Camilleri, DEQ