



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH  
DIRECTOR

July 20, 2016

Mr. Dennis C. Palmiter  
President and CFO  
Sun Steel Treating, Inc.  
550 Mill Street  
P.O. Box 759  
South Lyon, Michigan 48178-0759

SRN: B8851, Oakland County

Dear Mr. Palmiter:

**VIOLATION NOTICE**

On July 01, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Sun Steel Treating, Inc. (Sun) located at 550 Mill Street, South Lyon, Michigan. The purpose of this inspection was to determine Sun'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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 811-89.

During the July 01, 2016, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Heat treating process including molten salt baths.  Donaldson Torit Model DLMC 4/8/15 Collector, equipped with 320 Donaldson Torit PTEF Tetratex filter bags.	Permit to Install No. 811-89, Special Condition Nos. 15 & 17	The molten salt bath capture system was not operating properly resulting in visible emissions due to inadequate capture of particulate emissions from the molten salt baths.
Heat treating process including molten salt baths.  Donaldson Torit Model DLMC 4/8/15 Collector, equipped with 320 Donaldson Torit PTEF Tetratex filter bags.	Rule 336.1910	Donaldson Torit reverse-air baghouse was taken offline for maintenance while the salt bath process was operating in regular production mode.

On July 01, 2016, AQD staff observed operation of the heat treating process including the molten salt baths while the baghouse was taken offline for maintenance. The Donaldson baghouse and cartridge filter systems operate in parallel. The capture system was malfunctioning due to insufficient air flow due to taking Donaldson Torit baghouse offline during the maintenance. New Donaldson filter system and existing salt bath cartridge system work together although Donaldson system is overwhelmingly predominant.

This constitutes a violation of Act 451, Rule 336.1910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **August 10, 2016** (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.

A letter dated July 8, 2016 that AQD received on July 14, 2016, is inadequate and incomplete. At minimum the following are required:

1. Both production and maintenance employees must be trained to coordinate maintenance and production.
2. The production parts should not be placed in the salt baths when Donaldson Torit baghouse is offline for any reason. Salt baths may be maintained under molten condition to protect the equipment.

If Sun 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 Sun. 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,



Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
586-753-3741 or konanahalli@michigan.gov

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ