



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

June 24, 2021

Mr. Robert Fuller  
Peerless Metal Powders & Abrasives  
18900 Rialto Street  
Melvindale, MI 48122

SRN: M3754, Wayne County

Dear Mr. Fuller:

**VIOLATION NOTICE**

On May 20, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Peerless Metal Powders & Abrasives (Peerless Metal) located at 18900 Rialto Street, Melvindale, Michigan. The purpose of this inspection was to determine Peerless Metal's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Michigan Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 34-19A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY Recordkeeping – Throughput Records	PTI No. 34-19A, FGFACILITY, SC VI.1(j)	Natural gas combustion records are not kept.
	PTI No. 34-19A, FGFACILITY, SC VI.1(f)	Records of the amount of iron/steel processed by FG-MELT on a monthly and rolling 12-month time period were not provided.
	PTI No. 34-19A, FGFACILITY, SC VI.1(h)	Records of the amount of iron/steel processed by EU-ASPDYSEG1 and EU-ASPDYSEG2 on a monthly and rolling 12-month time period were not provided.
FGFACILITY Recordkeeping – Emissions Records	PTI No. 34-19A, FGFACILITY, SC VI.1(k) Appendix A	PM, PM10, and PM2.5 emissions have not been calculated from material throughput.
	PTI No. 34-19A, FGFACILITY, SC VI.1(l)	NO <sub>x</sub> , CO, VOC, individual HAP, and aggregate HAP emissions have not been calculated from material throughput.

Afterburner of FG-DRYERCRUSHER	PTI No. 34-19A, FG-DRYERCRUSHER, SC VI.2	Afterburner temperatures are collected less frequently than every 15 minutes.
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Peerless Metal has not provided natural gas usage and pollutant emissions records. This is a violation of recordkeeping requirements specified in FG-FACILITY Special Conditions VI.1(j), VI.1(k), VI.1(l), and Appendix A of PTI number 34-19A. The conditions of PTI number 34-19A require maintenance of natural gas usage and pollutant emissions records, which shall be made available for review upon request by the AQD staff.

Peerless Metal has not provided records of the amount of iron/steel processed by FG-MELT, EU-ASPDYSEG1, and EU-ASPDYSEG2. This is a violation of recordkeeping requirements specified in FG-FACILITY Special Conditions VI.1(f) and VI.1(h), of PTI number 34-19A. The conditions of PTI number 34-19A require records of the amount of iron/steel processed by FG-MELT, EU-ASPDYSEG1, and EU-ASPDYSEG2, which shall be made available for review upon request by the AQD staff.

Peerless Metals provided daily average temperature readings for the FG-DRYERCRUSHER afterburner, and indicated individual temperature readings are taken less frequently than every 15 minutes. This constitutes a violation of PTI No. 34-19A, FG-DRYERCRUSHER, Special Condition VI.2, which requires temperature measurements to be made at equally spaced intervals "...not to exceed 15 minutes per interval."

Enclosed is a copy of the above-cited PTI.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 15, 2021 (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.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Peerless Metal 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.

Mr. Robert Fuller  
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Peerless Metal. 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,



Sam Liveson  
Environmental Engineer  
Air Quality Division  
313-405-1357

Enclosure

cc: Mr. Clyde Robison, Peerless Metal  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Dr. April Wendling, EGLE  
Mr. Jeff Korniski, EGLE