



May 13, 2022

Mr. David Bowman
Michigan EGLE
AQD, Cadillac/Gaylord District
2100 West M-32
Gaylord, MI 49735

**Subject: Response to Violation Notice (April 25, 2022)
East Jordan Foundry, LLC
SRN: N6052, Antrim County**

Dear Mr. Bowman:

Please accept this letter in response to the Violation Notice issued to East Jordan Foundry, LLC (N6052) on April 25, 2022.

As requested in the Violation Notice, we are providing the following information:

- **Dates the Violation Occurred** – The equipment identified in the violation notice was installed when the facility began operation in November 2018. In January 2022, we discovered that some of the natural gas combustion equipment ratings did not match what was described in the FGNATGASUNITS section of PTI 185-16B. However, the combined heat rating for the equipment regulated in this flexible group is lower than what was previously permitted, i.e., a combined 152.4 MMBTU/hour is authorized by the PTI, but only 140.9 MMBTU/hour was installed.
- **Causes and Duration** – EUHTRDRYOFF, EUHTRSUPOFF, and EUHTRBOILBLD are comfort heaters. This equipment was installed to be appropriately sized for the offices/buildings in which they supply the comfort heat. EUDUCTHTRS are duct heaters. These duct heaters were appropriately sized and installed to maintain the dew point and to operate the dust collectors most efficiently/effectively. While we made a great effort in defining equipment needs in the detail engineering phase of this project, this phase predated equipment installation by over 12 months and resulted in some changes to the original equipment list.
- **Violation Ongoing** – The equipment is currently installed, but a PTI application is being discussed with AQD.
- **Summary of the Action(s) to Correct the Violation** – We will be seeking a revision to PTI 185-16B to include the appropriately sized equipment. After the submission of a curative PTI application on April 8, 2020, we have been in discussions with AQD's Permit Section about resubmitting a PTI application. A pre-application meeting is scheduled for June 8, 2022, and we hope to have the new permit issued by the end of 2022.
- **Steps to Prevent Reoccurrence** – We will conduct a thorough evaluation of all equipment before any future installation to determine whether there are applicable PTI exemptions or a need to apply for a PTI. We will attempt to identify future post-engineering design changes earlier in the equipment procurement process. These evaluations will ensure that any engineering design changes for equipment will be appropriately covered in the PTI or exemption evaluation prior to installation.

If you have any questions or concerns regarding this letter, please contact Mr. Tony Pitts at (717) 577-9878 or tony.pitts@ejco.com.

Sincerely,



Scott Nachazel
Facility Manager

cc: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, Michigan 48909-7760

Mr. David Bowman, EGLE (via email: BowmanD7@michigan.gov)
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