



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

April 18, 2016

CERTIFIED MAIL – 7010 0290 0000 3734 2170
RETURN RECEIPT REQUESTED

Mr. Jeff Machcinski
Advanced Heat Treat Corporation
1625 Rose Street
Monroe, Michigan 48162

SRN: N6452, Monroe County

Dear Mr. Machcinski:

VIOLATION NOTICE

On March 23, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Advanced Heat Treat Corporation located at 1625 Rose St., Monroe, Michigan. The purpose of this inspection was to determine Advanced Heat Treat Corporation 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 administrative rules and the conditions of Permit to Install (PTI) numbers 281-01 and 77-11 and to investigate a recent self-reported release of trichloroethylene (TCE) which we received on March 4, 2016, attributed to halogenated solvent cleaner operations.

Based on the information received during the inspection and with a follow up request for more information after the inspection, staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EUDEGREASER2 of FGDEGREASERS	40 CFR 63.464, SC 1.1a	The 3 month time period of Dec. 2015 through Feb 2016 averaged of 1758.85 lbs/month of TCE.
EUDEGREASER2 of FGDEGREASERS	R336.1205(3), R336.1225, R336.1702(a), 40 CFR Part 63 Subpart T, SC 1.3 and 1.4	The 3 month time periods of Dec. 2015 through Feb. 2016 and Jan. 2016 through March 2016 averaged 171.57 kg/m ² /month and 162.10 kg/m ² /month, respectively, of TCE.

The conditions of PTI number 281-01 limit the emissions of trichloroethylene to 1708 pounds per month based on a 3-month rolling time period as determined at the end of each calendar month.

This process is also subject to the federal Nation Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning. These standards are found in 40 CFR Part 63, Subpart T. Advanced Heat Treat Corporation had chosen to comply with Subpart T by using the Alternative Standard - Overall Emission limit. Subpart T requires the EUDEGREASER2 meet an emission limit of 150 kg/m²/month.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 9, 2016. 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.

If Advanced Heat Treat Corporation 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 March 23, 2016. 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,



Brian Carley
Environmental Quality Specialist
Air Quality Division
517-780-7843

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