



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

July 18, 2018

Mr. Kenneth P. Rogghe
Corporate Engineering Manager
Heat Treating Services Corporation - Plant 3
915 Oakland Avenue
Pontiac, Michigan 48340

SRN: N6726, Oakland County

Dear Mr. Rogghe:

VIOLATION NOTICE

On June 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Heat Treating Services Corporation - Plant 3 located at 915 Oakland Avenue, Pontiac, Michigan. The purpose of this inspection was to determine Heat Treating Services Corporation - Plant 3'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 169-01;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
One belt model natural gas fired metal heat treating furnace with a maximum heat input of 10.9MM BTU/hr. Furnace line is named "R5".	R 336.1201	Heat Treating Services Corporation - Plant 3 installed and commenced operation of a metal heat treating furnace without obtaining an air permit to install.

During this inspection, it was noted that Heat Treating Services Corporation - Plant 3 had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Mr. Kenneth Rogghe on June 26, 2018, that this is a violation of Rule 201 of Act 451.

A program for compliance may include a completed PTI application for the metal heat treating furnace "R5". An application form is available by request, or at the following website: www.michigan.gov/degair (in the shaded box on the upper right-hand side of the page)

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Be advised that Rule 201 of Act 451 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 8, 2018 (which coincides with 21 calendar days from the date of this letter). 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 recurrence.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092-2793 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Heat Treating Services Corporation - Plant 3 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 Heat Treating Services Corporation - Plant 3. 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,



Adam Bognar
Environmental Quality Analyst
Air Quality Division
586-753-3744

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ