



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 10, 2022

Mr. Brian Miller
A & L Iron and Metal, Inc.
2000 Millbocker Road
Gaylord, Michigan 49735

SRN: N7508, Otsego County

Dear Mr. Miller:

SECOND VIOLATION NOTICE

On October 5, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed verification testing of the EUGENERATOR located at A & L Iron and Metal, Inc., 2000 Millbocker Road, Gaylord, Michigan. The purpose of the oversight was to determine compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 173-08B.

On January 4, 2022, the AQD sent A & L Iron and Metal, Inc. a Violation Notice citing the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUGENERATOR	I.1, I.2, I.3	<ol style="list-style-type: none"> 1. Testing conducted below normal operating loads identified in approved Test Plan. 2. CO spikes outside of instrument range occurred during testing and were not recorded by the DAS. Actual values are unknown 3. CO Destruction Efficiency calculations were not per 40 CFR 63.6603, Subpart ZZZZ. 4. The AQD's calculations determined the CO emissions exceeded the PTI and 40 CFR 63.6603 limits

Mr. Brian Miller
A & L Iron & Metal, Inc.
Page 2
February 10, 2022

Operating Loads - The A & L Iron and Metal, Inc. VN response letter dated January 20, 2022, indicated that generator loads reported for the 2018 test event were in error, and that the operational loads were in fact consistent with the reduced loads reported for the October 5, 2021, testing. This indicates that the operational loads were erroneously reported to the U.S. Environmental Protection Agency misrepresenting the operational load achieved during required testing conducted to meet requirements under EPA-15-18-133(a)-MI-04.

The operational load during testing is required to reflect the maximum operating load to ensure compliance with emission limits. Operational loads during testing set operational limits for compliance. Testing at operational loads so far below the maximum potential must have a method to verify that unit is not being operated at levels above those during testing. This would require a continuous recording device associated with the EUGENERATOR to show the operational load.

The AQD's Technical Program Units (TPU) staff was onsite to observe testing and post testing activities noted that engine operation changed once testing was completed and the AQD's District Staff had left the site. Specifically, noise levels were reported to significantly elevate following departure of the AQD District Staff and remained at elevated levels. Prior to leaving site TPU Staff documented average KWHs of 1051-1098 KWHs. Well above levels of 524 KWH recorded during test activities.

Data Evaluation - Evaluation of the December 3, 2021, Stack Test Report by the AQD's TPU Staff indicated that the tester did not calibration correct the CO or O2 data in the test report as required by the approved methods.

In addition, CO concentrations exceeded analyzer range several times during the testing on the inlet and outlet analyzers. The tester attempted to justify the results by calculating the DE minute by minute showing compliance on 58 or 59 minutes out of 60 (again without calibration correcting the data). This is problematic as the majority of each run's emissions occurred during these couple of minutes when the analyzers were unable to record a concentration. It was determined that without truly knowing the concentrations of the CO spikes it is inconclusive whether or not the source passed the CO DE test.

The AQD's TPU calculated a Destruction Efficiency (DE) of 67% (below the minimum 70% CO DE required to pass testing) when using data as reported by the DAS and then applying the appropriate calibration corrections. As such, the 2021 testing cannot be accepted to show compliance with the CO DE.

Other- In addition to analytical data presented in the December 3, 2021, stack test report. Pre and post catalyst temperatures recorded by AQD District Staff during the October 5, 2021, testing indicated that the temperature highs reversed between pre and post catalyst readings throughout the testing. This data collected by AQD District Staff

Mr. Brian Miller
A & L Iron & Metal, Inc.
Page 3
February 10, 2022

appears to indicate that the catalyst was not operating properly at the time of the October 5, 2021, testing.

Please be advised that failure to respond in writing and identifying actions that have been or will be taken to resolve the unacceptability of the CO test data may result in escalated enforcement action by the AQD. Please provide the information requested by February 24, 2022, which corresponds to 14 days from the date of this letter.

Please submit the written response to EGLE, AQD, Gaylord District, at 2100 M32 West, Gaylord, Michigan 49735 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring A & L Iron and Metal, Inc. into compliance, please contact me at the number listed below.

Sincerely,



Sharon G. LeBlanc
Air Quality Division
989-217-0055

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Shane Nixon, EGLE