



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 8, 2022

E.J. Stumph
Woodworth, Inc.
29753 M-60
Homer, Michigan 49245

SRN: P0547, Calhoun County

Dear E.J. Stumph:

VIOLATION NOTICE

On October 17-20, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed scheduled stack testing at Woodworth, Inc located at 29753 M-60, Homer, Michigan. The purpose of this scheduled stack testing was to demonstrate Woodworth's compliance with the emission 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 64-15D;

Based on observations during the stack testing and reported results:

Process Description	Rule/Permit Condition Violated	Comments
FGHEATTREAT	PTI 64-15D Special Condition (SC) I.2	The facility commenced Run 1 for NOx and ammonia (NH3) on October 17, 2022. Because of the testing method, results were available for both pollutants, instantaneously. Because the results of Run 1 indicated an exceedance of the ammonia limit, the facility chose to abandon the test event and modify the ammonia and natural gas formation used during the ferric nitrocarburizing (FNC) cycle. According to guidance issued by the EPA "if a facility stopped the stack test because it was exceeding the

		applicable emission standards and would have failed the test, it would be considered in violation of...the requirement to...comply with the underlying regulatory requirement or permit condition."
FGHEATTREAT	PTI 64-15D Special Condition (SC) I.2	The facility completed required stack testing on FGHEATTREAT on October 18-20, 2022. The reported three run test average is 0.69 lb/hour NH3 and the listed permit limit is 0.58 lb/hour.

During Run 1 on October 17, 2022, the initial FTIR results showed much higher emissions than during the previous testing. The previous testing event recorded ammonia concentrations of about 24 ppm, which is approximately 0.7 pounds per hour (lb/hr) of ammonia. The results during the first run showed that the ammonia emissions spiked to more than 900 ppm and then slowly decreased over the course of the run to about 30-40 ppm. Based on the submitted results, this converts to 3.25 lb/hr of ammonia for Run 1.

The large change in ammonia emissions observed during this testing event, compared to the previous testing, was discussed with the facility. The facility disclosed that in mid-June 2022, in response to the rising cost of ammonia and with the intent of streamlining the FNC process, the facility changed the formula used in the furnace for the FNC process.

Because the results of Run 1 indicated an exceedance of the ammonia limit, the facility chose to abandon the test event and return to the original formula for the FNC process and restart the testing. The Department informed them that this would be considered a change in operation and would need 3 separate test runs, using the original FNC process formula, to demonstrate compliance with the emission limit.

Run 2, using the original FNC, began on October 18, 2022. The three runs were completed on October 20, 2022. Test results were received by the Department on November 30, 2022. Based on the report submitted, the three-run test average is reported as 0.69 lb/hour of ammonia. The listed permit limit in FGHEATTREAT for ammonia is 0.58 lb/hour. This is an exceedance of the permitted ammonia limit by about 16%.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 5, 2023. 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, Kalamazoo District, at 7953 Adobe Rd, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Woodworth, Inc. 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 observation of scheduled stack testing at Woodworth, Inc. 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,



Amanda Cross
Senior Environmental Quality Analyst
Air Quality Division
269-910-2109

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Rex Lane, EGLE
Bob Lixey, Woodworth Inc.