



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

June 12, 2017

Mr. Jim Hirschman, Owner
C & S Steel
301 Industrial Parkway, Avenue B
Ithaca, Michigan 48847

SRN: U291701964, Gratiot County

Dear Mr. Hirschman:

VIOLATION NOTICE

On May 18, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of C & S Steel located at 301 Industrial Parkway, Avenue B, Ithaca. The purpose of this inspection was to determine C & S Steel'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); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Shot blasting	Rule 336.1285(2)(l)(vi)(C)	Shot blasting operations conducted without appropriately designed and operated fabric filter collection device.
Shot blasting	Rule 336.1201(1)	Shot blasting operations do not meet exemption criteria; therefore, also in violation of Rule 201.
Shot blasting	Rule 336.1370(1)	Particulate from the process was found on the ground surrounding the shot blasting exhaust system.
Shot blasting	Rule 336.1910	Fabric filter collector was not properly installed, maintained and operated in a satisfactory manner.

During this inspection, it was noted that C & S Steel had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised C & S Steel on May 18, 2017, that this is a violation of Act 451, Rule 201, because they did not meet the exemption criteria specified in Rule 336.1285(2)(l)(vi). Rule 336.1285(2)(l)(vi) states:

“The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

The following equipment and any exhaust system or collector exclusively serving the equipment:

Equipment used exclusively for ...shot blasting ...metals which meets any of the following:

- (A) Equipment used on a nonproduction basis
- (B) Equipment that has emissions that are released only to the in-plant environment
- (C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.”

Specifically, AQD staff observed shot blasting media on the ground surrounding the exhaust system, which also constitutes a violation of Act 451, Rule 370, which requires that collection of air contaminants be performed in a manner so as to minimize the introduction of contaminants to the outer air.

Additionally, the AQD staff observed that the shot blasting operation had been operated while the fabric filter was not installed properly. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

A program for compliance may include a completed PTI application for the shot blasting process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right hand side of the page).

Be advised that Rule 201 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 violations and submit a written response to this Violation Notice by July 3, 2017. 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

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 C & S Steel 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 C & S Steel. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-284-6636

ML:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ