11-8-19
Mr. Eric Grinstern
Environmental Quality Specialist
Air Quality Division

Dear Mr. Grinstern,

On November 4th, John Belles received an email containing two notices that had been sent to Hastings Manufacturing Company. The letters indicate the request to perform tests on Scrubber No. 1, Scrubber No.2 and our two 2-ton electric induction iron melting furnaces. The request is being made indicating Hastings Manufacturing Company is in violation of Rule 1001 (R 336.2001) and General Condition 18 of PTI No. 277-86.

In review of PTI No. 277-86 Special Condition 18 user is referred to Rule 1001 (R 336.2001) - Performance tests by owner. Hastings Manufacturing Company protests the request for testing as we have not altered our processes. Thus we have not met any of the conditions a,b,c,d,e, or f indicated as a reasons for requiring testing.

Hastings Manufacturing Company has maintained our compliance status in good standing. The most recent Unannounced Compliance Inspection was performed on 7-27-18. During this inspection the determination was "Compliance Status: Compliance".

In regard to our two 2-ton furnaces Hastings Manufacturing Company is operating, per previous cooperative visit, under exemption R 336.1291. Hastings Manufacturing Company meets all criteria for the exemption per the calculations using EPA /MAERS table. (FIRE6.22 & MAERS) Hastings Manufacturing Company has obtained a verbal quote for regulatory compliance testing. This estimate is $9,000. This is a substantial burden for any organization if the testing is not necessary.

If you feel the information presented above is incorrect, please cite the specific section of Rule 1001 so that we can work together towards an amiable solution.

Hastings Manufacturing Company strives to be a good corporate citizen to protect our employees, city, and environment. We look forward to continuing relationship with EGLE.

Thank you for your consideration of the information above.
Sincerely,

Dennis Graham
Vice President of Operations
Mobile: 269-779-1142