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Of Counsel: Emily K. Neuberger¹

Received
DEQ/AQD
JAN 08 2019
Z | A | C
Zausmer, August & Caldwell, P.C.
FARMINGTON HILLS & LANSING
MACES _____ MAERS: _____
CC: _____

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January 4, 2018

Joseph Scanlan
Upper Peninsula District
Air Quality Division
Michigan Department of Environmental Quality
1504 West Washington
Marquette, MI 49855

Re: Grede, LLC
Kingsford, Michigan
November 30, 2018 Violation Notice ("NOV")

Dear Mr. Scanlan:

I am writing on behalf of Grede, LLC ("Grede") in response to the Department of Environmental Quality, Air Quality Division's ("AQD") November 30, 2018 NOV regarding Grede's Kingsford facility.

The NOV arises from AQD's September 18, 2018 compliance inspection of the Kingsford facility. The only compliance issue AQD observed was related to the Module Torit Collector ("MTC"). Grede immediately shut down the MTC, disposed of the small amount of dust that had leaked from the unit, and contacted JM Steel to repair the MTC. JM Steel arrived the same day as the inspection and began repair

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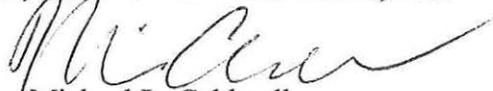
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on the MTC. JM Steel determined that “fines” had worn through the metal in a small area of the MTC. The repairs included installation of wear plates and support bands inside the affected area of the collector. By September 19, 2018, JM Steel had completed the repairs to the damaged area. The MTC was returned to operation on September 19, 2018 and checked for leaks and none were found. In order to prevent a reoccurrence of this issue, Grede instructed JM Steel to install additional wear plates and support bands to strengthen the structure in the repaired area of the MTC. (See attached JM Steel Invoice referencing installation of enhancements to the MTC). Grede has also reviewed its existing preventative maintenance program for the MTC and added steps to its weekly inspection protocol to ensure that any potential issues, including excess wear, can be identified before a leak occurs.

In sum, the compliance issue related to the MTC was of short duration and does not appear to have resulted in any significant fugitive dust from the Kingsford facility. Grede will continue to work cooperatively with AQD staff to assure Grede’s continued compliance with all applicable legal requirements. If AQD has any further concerns regarding this issue, please contact Tom White.

Very truly yours,

ZAUSMER, AUGUST & CALDWELL, P.C.



Michael L. Caldwell

MLC/bas
Enc.

cc: Ed Lancaster, AQD
Jenine Camilleri, AQD
Dean Teeples
Tom White
Tyler Hill
Paul Blindauer, GEI

COPY

JM Steel Inc.

10.10.2018

Invoice #

1149

405582
Rec # 167134
10/22/18

Bill To:

AAM

Grede LLC-Iron Mountain

801 S. Carpenter Avenue

Kingsford, MI 49802-5594

Ship To:

JM Steel Inc.

W3765 Gravel Point Road

Vulcan, Mi 49892

Vendor No. 405582

Make all checks payable to:

JM Steel Inc.

If you have any questions concerning this invoice, contact:

Jack Milbrath

906-221-3987

REPAIR MODULE TORIT

Dates	Description	Price	Quantity	Amount
10/6/2018-10/7/2018	Labor & Equipment			\$ 3,500.00
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
	Total items: 1		Subtotal	\$ 3,500.00

Sales Tax Rate: 0.0%	Sales Tax	Included
	Less Deposit Received	\$ -
	Invoice Total	\$ 3,500.00

Thank you for your business!

JM Steel Inc.

W3765 Gravel Point Road

Vulcan Mi 49892

jmil783@gmail.com

100%
Comp

OK
WB
10-22-18

POR64002
10/09/18

P. O. RECEIPTS
(Update)

Iron Mtn
9:42:29

Packing Slip#: _____ Vendor: 405582
Ship Via . . . > SEE NOTE JM STEEL INC
Received By. : _____ P.O.# : 40408
Received On. : _____

+ Codes: 2=P.O. Item 5=Matl Comments 7=Full P.O. 8=Comments 9=Matl Inv

<u>± Itm</u>	<u>Matl Inventory#</u>	<u>Purchase/ Stock UM</u>	<u>***** Ordered</u>	<u>Quantity Open</u>	<u>***** Received</u>	<u>Cmpl Y/N</u>	<u>Loc. ></u>
-	1		3500.00	3500.00	.00	-	0101
	REPAIR MODULE TORIT	Part#:			Reqstr: CSR		

F3=Exit F4=Inq F6=Vendor Mstr F10=Comments F12=Prev F21=Select All Page