



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

August 23, 2021

Mr. Malcolm Satterfield  
Musashi Auto Parts  
195 Brydges Drive  
Battle Creek, Michigan 49037

SRN: N2074, Calhoun County

Dear Mr. Satterfield:

**VIOLATION NOTICE**

On July 21, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Musashi Auto Parts located at 192 Brydges Drive, Battle Creek, Michigan. The purpose of this inspection was to determine the Facility'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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 46-00, 235-04, 59-05, 98-09, 192-09, 219-09, 285-97B, 26-13, 207-15, and 8-19.

During the inspection, staff observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
Induction Furnace	Rule 336.1201(1)	Facility has installed a sixth induction furnace without first obtaining a PTI for installation or operation. Furnace was installed in approximately 2009.
Recordkeeping and Emissions Excedance EUINDFURN1 and EUINDFURN2	PTI No.46-00 Special Conditions (SC) 4	The facility is tracking production records and emissions information for all 6 induction furnaces combined. This information cannot be broken down into individual furnace emission data. The provided emissions information shows

		<p>exceedances of the 2.8 tons per year VOC on a 12 month rolling basis. The highest reported VOC emissions were 3.5 tons per year VOC on a 12-month rolling basis.</p>
<p>VOC Emission Limits          EUINFURN3</p>	<p>PTI No. 98-09 SC I.1</p>	<p>The facility is tracking production records and emissions information for all 6 induction furnaces combined. This information cannot be broken down into individual furnace emission data. The provided emissions information shows exceedances of the 2.8 tons per year VOC on a 12 month rolling basis. The highest reported VOC emissions were 3.5 tons per year VOC on a 12-month rolling basis.</p>
<p>Process/Operational          Restrictions EU-AMMONIA</p>	<p>PTI No. 235-04 SC III.3</p>	<p>The facility shall not operate EU-AMMONIA unless an emergency response plan is in place. Prior to each spring season, the permittee shall review this plan with the local fire department or emergency response agency to make any necessary updates. The facility completed this review when the plan was created but has not continued to review it each spring with the appropriate agency.</p>
<p>Design/Equipment          Parameters EU-AMMONIA</p>	<p>PTI No. 235-04 SC IV.5</p>	<p>All hoses shall be replaced 5 years after the</p>

		date of manufacture or more often if there is evidence of damage or deterioration. Records were requested to verify the replacement frequency of the hoses. These were not provided so the replacement frequency cannot be verified.
Material Limit EU-S-TFC-100-6	PTI No. 26-13 SC II.1	The permittee shall not use more than 110.0 gallons/month of quench oil to replenish lost quench oil. Records show that in January and February 2020, 165 gallons of quench oil was added. In November 2019, 210 gallons of quench oil was added.
Process/Operational Restrictions EUPHOSPATELINE	PTI No. 8-19 SC III.1	The permittee shall not operate EUPHOSPATELINE unless a malfunction abatement plan (MAP) for the wet scrubber has been submitted within 45 days of permit issuance. The MAP has not been submitted to the district supervisor for review and was not submitted as part of the records request.
Monitoring/Recordkeeping EUPHOSPATELINE	PTI No. 8-19 SC VI.3	The permittee shall keep records of the gallons of each material used in EUPHOSPATELINE each month and 12-month rolling time period. The facility supplied purchase records of the pounds of materials purchased for use on

		EUPHOSPHATELINE. Purchase records are not sufficient to show compliance with this monitoring and recordkeeping requirement for monthly usage tracking.
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### **Rule 201 Violations**

During this inspection, it was noted that the Facility had installed and commenced operation of unpermitted equipment at this facility. In discussion with the facility and verified by looking through past permit to install applications, the permittee only has PTIs to cover five induction furnaces installed on site. The facility installed the sixth induction furnace on site about 2009-2010.

A program for compliance may include a completed PTI application for the EUINDFURN6 process equipment. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air) (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.

### **Emission Limits Violations**

The records provided demonstrate that actual emissions of VOC from the induction furnace process equipment are 3.5 tons per year on a 12-month rolling basis. The conditions of PTI number(s) 46-00 and 98-09 limit the emissions of VOC to 2.8 tons per year on a 12-month rolling basis. The emission limits are 2.8 tons per year VOC for EUINDFURN1 and EUINDFURN2 and 2.8 tons per year VOC for EUINDFURN3. The records are being kept in such a way that emissions cannot be separated out by furnace. Since the emissions cannot be verified for how the permits are structured, it is considered a violation of the emissions limit.

### **Process/Operational Restriction Violations**

The permittee shall not operate EUPHOSPHATELINE unless a malfunction abatement plan (MAP) for the wet scrubber has been submitted within 45 days of permit issuance. The MAP has not been submitted to the district supervisor for review and was not submitted as part of the records request.

The facility shall not operate EU-AMMONIA unless an emergency response plan is in place. Prior to each spring season, the permittee shall review this plan with the local fire department or emergency response agency to make any necessary updates. The facility completed this review when the plan was created but has not continued to review it each spring with the appropriate agency.

### **Design/Equipment Parameters**

All hoses in EU-AMMONIA shall be replaced 5 years after the date of manufacture or more often if there is evidence of damage or deterioration. Records were requested to verify the replacement frequency of the hoses. These were not provided so the replacement frequency cannot be verified.

### **Material Limit Violations**

PTI No. 26-13 establishes material limits for the quench oil used in the electric heat treat carburizing furnace with internal oil quench named EU-S-TFC-100-6. Based on the records provided, the facility exceeded to 110.0 gallons of quench oil material limit in January and February 2020 with 165 gallons of quench oil added. In November 2019, 210 gallons of quench oil was added.

### **Monitoring/Recordkeeping Violations**

PTI No. 8-19 requires the permittee to keep records of the gallons of each material used in EUPHOSPAHTELINE each month and 12-month rolling time period. The facility was able to supply purchase records of pounds of material purchased for use on the line but these are not sufficient to show compliance with the requirement to track monthly and 12-month usage on the line. The facility should begin tracking usage of all materials used on the phosphate line, in gallons, monthly and on a 12-month rolling basis.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 13, 2021 (which coincides with 21 calendar days from the date of this letter). 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 Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If the Facility 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 Musashi Auto Parts. 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,

A handwritten signature in dark ink, appearing to read "Amanda Chapel". The signature is written in a cursive, flowing style.

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

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