



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

March 2, 2018

Mr. Raymond Fox
Detroit Steel Treating Company
1631 Highwood East
Pontiac, Michigan 48340

SRN: N5551, Oakland County

Dear Mr. Fox:

VIOLATION NOTICE

On February 15, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Detroit Steel Treating CO located at 1631 Highwood East, Pontiac, Michigan. The purpose of this inspection was to determine Detroit Steel Treating Co'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 219-96.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Three steel hardening furnaces with internal oil quench systems and nitriding capabilities.	R 336.1201	Detroit Steel Treating CO installed and commenced operation of three steel hardening furnaces without obtaining a permit to install. These furnaces utilize both oil quenching and ammonia.

During this inspection, it was noted that Detroit Steel Treating Company had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Mr. Raymond Fox on February 20, 2018, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the three steel hardening furnaces which utilize both internal oil quenching and ammonia. 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)

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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 violation and submit a written response to this Violation Notice by **March 23, 2018** (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Detroit Steel Treating CO 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 violation cited above and for the cooperation that was extended to me during my inspection of Detroit Steel Treating CO. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar
Environmental Quality Analyst
Air Quality Division
586-753-3744

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