



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

December 13, 2017

Mr. Ed Dombrowski
Industrial Metal Cleaning Corporation
1165 North Gateway Boulevard
Norton Shores, Michigan 49441

SRN: N5995, Muskegon County

Dear Mr. Dombrowski:

VIOLATION NOTICE

On November 2, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Metal Cleaning Corporation (IMCC), located at 1165 North Gateway Boulevard, Norton Shores, Michigan. The purpose of this inspection was to determine IMCC'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) numbers 396-96 and 88-11.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Rack Burn-Off Ovens B02 and B03	PTI No. 396-96, Special Condition 15	Failure to maintain a minimum afterburner operating temperature of 1,400°F.
Rack Burn-Off Ovens B01, B02, B03, B04 and B05	Rule 910	Improper operation of control device.
Rack Burn-Off Oven B05	PTI No. 88-11, Special Condition IV.3	Failure to install or operate an interlock system between the afterburner and primary burner as required by the PTI.

On November 2, 2017, the AQD staff observed operation of the afterburners for rack burn-off ovens B02 and B03 at temperatures lower than 1,400°F. Oven B02 was operating with a main chamber temperature of 469°F and an afterburner temperature of 1,174°F. Burn-off oven B03 was operating with a main chamber temperature of 795°F and an afterburner temperature of 1,375°F. This is a violation of PTI No. 396-96, Special Condition 15 which requires the facility to operate the afterburners at a minimum temperature of 1,400°F.

As discussed with IMCC, burn-off ovens B01-B05 are loaded and reloaded with the primary burner and afterburner operating, which requires opening the oven doors during operation. Opening of the doors causes afterburner temperatures to drop below 1,400°F and is not recommended by the manufacturer. Therefore, operating at temperatures lower than 1,400°F and not properly following manufacturer's startup and cool down procedures also constitutes a

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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.

In addition, PTI No. 88-11, Special Condition IV.3 for burn-off oven B05, requires an interlock system to be installed, maintained and operated in a satisfactory manner. Operating the afterburner at temperatures below 1,400°F is not considered satisfactory and should shut down the primary burner. Per discussions with the oven manufacturer, Burn-off oven B05 is not equipped with an interlock system that operates as required by the PTI.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 3, 2018 (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.

If IMCC 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 Industrial Metal Cleaning Corporation. 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,



Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-356-0259

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