



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

January 4, 2021

Mr. Brian Miller
A & L Iron & Metal, Inc.
2000 Millbocker Road
Gaylord, Michigan
49734

SRN: N7508, Otsego County

Dear Mr. Miller:

VIOLATION NOTICE

On October 5, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed emission verification testing activities for EUGENERATOR located at A & L Iron & Metal, Inc., 2000 Millbocker Road, Gaylord, Michigan. The purpose of the referenced activities was to determine 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 173-08B;

The referenced emission verification testing activities were summarized in a Test Report prepared by Impact Compliance and Testing, Inc. dated December 3, 2021, and received electronically by Gaylord District Staff. In reviewing the document staff have identified the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGENERATOR	I.1, I.2, I.3	<ol style="list-style-type: none"> 1. Testing conducted below normal operating loads identified in approved Test Plan. 2. CO spikes outside of instrument range occurred during testing and were not recorded by the DAS. Actual values are unknown 3. CO Destruction Efficiency calculations were not per 40 CFR 63.6603, Subpart ZZZZ. 4. The AQD's calculations determined the CO emissions exceeded the PTI and 40 CFR 63.6603 limits

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The records provided in the December 3, 2021, test report demonstrate that actual emissions of CO from EUGENERATOR at an average of 21.2% operating load exceed the limits established in PTI 173-08B, SC I.1 and 40 CFR 63.6603. Normal operating load for EUGENERATOR was identified in the August 2, 2021, Test Plan as 50-60%. In addition, CO spikes that occurred during testing have resulted in incomplete data set(s) and the resulting destruction efficiency calculations were noted to not have been completed per Method.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 25, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation/Testing occurred; a summary of the actions that have been taken and are proposed to be taken to correct the above referenced 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, Gaylord District, at 2100 W. M-32, Gaylord, Michigan 49735 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If A & L Iron & Metal, Inc. 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 issues cited above and for the cooperation that was extended to myself and other AQD Staff during test observations and subsequent information requests. If you have any questions regarding the violations identified or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sharon G. LeBlanc
Environmental Quality Analyst
Air Quality Division
989-217-0055

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