



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

April 10, 2024

VIA EMAIL

Craig Bishop, Operations Manager
Northern Steel Services
11341 West Vienna Road
Montrose, Michigan 48457

SRN: P0972, Genesee County

Dear Craig Bishop:

VIOLATION NOTICE

On March 15, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Northern Steel Services located at 11341 West Vienna Road, Montrose, Michigan. The purpose of this inspection was to determine Northern Steel Services' 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 161-18.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPAINTAREA3	PTI 161-18, FGCOATING Special Condition (SC) I.1	Records showed that in May and June of 2023, the 2,000 pounds per month volatile organic compound (VOC) emission limit for a single paint area was exceeded.

The records provided, demonstrate that in May and June of 2023, actual emissions of VOCs from the Paint Area 3 process equipment, were 2,055 pounds and 2,330 pounds, respectively. This is a violation of PTI 161-18, FGCOATING, SC I.1, which limits each coating area to 2,000 pounds of VOC per month, including all associated purge and clean-up operations.

Please note that PTI 161-18 was written so that Northern Steel Services had emission limits in the flexible groups FGCOATING and FGMETALPARTS, which allowed the company to use the exemption of Rule 621(10) of the administrative rules from the coating content VOC limits of Rule 621. This exemption was contingent upon meeting the VOC emission limits in the PTI. Because the 2,000 pounds per month VOC limit was exceeded, it will be necessary for Northern Steel Services to determine if during the months of

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May and June 2023, if any coatings were used which exceeded the VOC content limits in the rule. If so, that would constitute an additional violation during that time.

Rule 621 of the administrative rules, also identified as R 336.1621, may be found in the AQD's Part 6 Rules at the following link:

<https://ars.apps.lara.state.mi.us/AdminCode/DownloadAdminCodeFile?FileName=R%20336.1601%20to%20R%20336.1662.pdf&ReturnHTML=True>

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 1, 2024, (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. Additionally, please determine as part of your response, if any coatings were used during the months of May and June 2023, which would have exceeded the coating content VOC limits in Rule 621 of the administrative rules.

Please submit the written response to Daniel A. McGeen at EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 or McGeenD@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Northern Steel Services 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 Northern Steel Services. 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,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE