



5205 Kaiser Drive, Kalamazoo, Mi. 49048

Andrew Frisbie
Kaiser Aluminum
5205 Kaiser Dr.
Kalamazoo, Mi. 49048

July 18, 2017

Mr. Rex I. Lane
Senior Environmental Quality Analyst
Department of Environmental Quality, Air Quality Division
7953 Adobe Road
Kalamazoo, Mi. 49009-5025

Dear Mr. Rex I. Lane:

This letter is in response to the Violation Notice (“VN”) sent to my attention on 6/27/17, which was generated from the inspection at the Kaiser Aluminum facility, located at 5205 Kaiser Drive, Kalamazoo, Michigan on 6/23/2017. Through its response, Kaiser seeks an amicable resolution to the VN. See table below for reference of the alleged violations:

| | Process Description | Rule/Permit Condition Violated | Comments |
|---|----------------------------|---------------------------------------|---|
| 1 | EUMELTFURNACE | PTI No. 113-09D, Condition VIII.2 | Permit condition requires stack exhaust to discharge unobstructed vertically upwards to the ambient air. The furnace flue stack is equipped with a rain protection cap that does not allow the stack exhaust to meet the requirements of this permit condition. |
| 2 | EUHMFURNACE | PTI No. 113-09D, Condition VIII.1 | Permit condition requires stack exhaust to discharge unobstructed vertically upwards to the ambient air. The furnace flue stack is equipped with a rain protection cap that does not allow the stack exhaust to meet the requirements of this permit condition. |

- 1) Regarding the EUMELTFURNACE, Kaiser Aluminum has attempted to obtain the original design and permitting information pertaining to this matter; however, we have had some difficulty obtaining all the potentially relevant information in this matter as our Consulting Company changed shortly after the initial permit application was filed and several of the parties that worked on the design/permit



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have since retired. In addition, from a safety perspective, it is very important to prevent any direct precipitation into the melting furnace. Consequently, we request additional time to research and resolve this matter.

- 2) Regarding the EUHMFURNACE, this stack is currently exhausting unobstructed vertically, and was at the time of your visit to our facility. Please reference the photograph included on page three, in Appendix A.

Kaiser reserves all its rights, claims and defenses in this matter while it works with MDEQ to resolve the VN.

Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Frisbie".

Andrew Frisbie
EHS Manager
Kaiser Aluminum, Fabricated Products LLC
Cell: 269-359-2571

Enclosure

Cc: Ms. Mary Ann Dolehanty, DEQ
Ms. Mary Douglas, DEQ
Mr. Roger Crawford, Kaiser Aluminum
Mr. Mark Shelley, Kaiser Aluminum
Mr. Edgar Scott, Kaiser Aluminum
Mr. Charles Denton, Barnes & Thornburg LLP
Ms. Stephanie Jarrett, Fishbeck, Thompson, Carr, & Huber

KAISER ALUMINUM

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Appendix A (SV-HMFURNACE – unobstructed)

