



October 14, 2021

Adam Shaffer, Environmental Quality Analyst  
Air Quality Division  
Department of Environment, Great Lakes and Energy  
Bay City District Office

Subject: Violation Notice dated October 7, 2021

Dear Mr. Shaffer,

I've received and read thru the afore mentioned Violation Notice and would like to offer my questions and commentary.

First, as shown on my business card, my proper name is Richard Singer. Rich is a nickname and used by my friends and family. On all future official correspondence please address me by my proper name, Richard. As a retired Colonel in the US Army I may also be addressed as Colonel Singer.

The name of our Company is Acra Cast. Acra is not an acronym and therefore should not be spelled ACRA. In case you are curious, the word 'acra' is an ancient Greek word from the Hellenistic era which describes a fortified structure. The use of the word in our name predates my involvement with the company so I don't know why it was selected.

In the Activity Report, on page 1 in the second paragraph under Compliance Evaluation you stated "...the desired product before being incased in a ceramic mold." The standard form of the word is 'encase'. 'Incase' is an outdated historical spelling and no longer in common use.

On page 3 of the same Activity Report, about halfway through the page you refer to "Three wax injection mold units that make the pre molds later used...". These three machines are wax injection presses. The wax pieces they produce are referred to as 'patterns'. The presses inject wax into dies to make patterns. Later in the process we use ceramic 'molds' that the metal alloys are poured into. Just trying to keep the terminology straight here.

During your unannounced visit to Acra Cast, Inc. I believe you mentioned that the last time a DNRE/MDEQ/EGLE representative had visited the plant was 2011. That's 10 years ago, an entire decade. Conversely, you've ordered Acra Cast, Inc. to respond within 21 days. Considering the apparent lack of urgency on the part of EGLE we should be allotted more time to comply with your demands. I think 90 days would be appropriate so we will be responding on or before January 5, 2022.



On page 4 of 4 of the Activity Report, in the last paragraph before the Conclusion, the last sentence reads: "The non-submittal of the applicable notifications and semiannual certifications reports is a violation of the NESHAP Subpart ZZZZZ." I am not familiar with the myriad of rules and regulations and subparts and all of the rest of the bureaucracy associated with the tangled web of environmental law in today's America. That's why the taxpayers have agreed to pay for the administrators and staff of the EGLE and other state and federal agencies. In other words, we are not the subject matter experts (SME), you and your coworkers at EGLE are.

With that in mind I'm curious about the mechanisms in place at EGLE to record the receipt, or non-receipt, of the applicable initial notifications and semi-annual compliance reports. According to your statement on page 3 of 4 of the Activity Report the MDEQ, now EGLE, was given delegation by EPA to enforce the NESHAP Subpart ZZZZZ on May 4, 2014. By my accounting that's 14 semiannual reports that we have not submitted. Why is this only being brought to our attention now? Surely there are systems in place at EGLE to alert you to the fact that companies have not submitted their paperwork. I look forward to your explanation.

Finally, I see in the CC block of the Violation Notice that five additional EGLE employees were copied on your letter. I understand why Mr. Chris Hare, EGLE, your supervisor, was copied. I'm curious as to why so many other employees of EGLE were copied. This seems like an excessive amount of bureaucracy from my viewpoint as a taxpayer. With your response to this letter I would appreciate a listing of the job title and a brief job description of each of the copied EGLE bureaucrats that received a copy of the Violation Notice.

Thank you for your service to our great state and your role in keeping us all safe from the polluters that live and work among us.

With Warmest Regards,

A handwritten signature in black ink that reads "Richard B. Singer". The signature is written in a cursive style with a large, prominent 'R' and 'S'.

Richard B. Singer, President/Owner  
Acra Cast, Inc.  
Colonel, US Army, Aviation (Retired)