



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 16, 2021

Mr. Luke Ryskamp
WKW Extrusion, Erbsloeh Aluminum Solutions, Inc.
6565 South Sprinkle Road
Portage, Michigan 49002

SRN: N2170, Kalamazoo County

Dear Mr. Ryskamp:

VIOLATION NOTICE

On August 19, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of WKW Extrusion, Erbsloeh Aluminum Solutions, Inc. (the facility) located at 6565 South Sprinkle Road, Portage, Michigan. The purpose of this inspection was to determine the facility'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 458-89C and 11-20.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Bright dip tank	PTI #458-89C, Special Conditions 1 and 2	Facility is not keeping nitric acid and phosphoric acid emissions records.
Caustic etch tank, two stripping tanks, and two die cleaning tanks	PTI #458-89C, Special Condition 3	Facility is not keeping sodium hydroxide emissions records.
EUHEATTREAT	PTI #11-20, Special Condition VI.1	Facility is not keeping pressure drop records.
EUHEATTREAT	PTI #11-20, Special Condition III.1	Facility has not submitted a Malfunction Abatement Plan.
EUHEATTREAT	PTI #11-20, Special Condition VII.1	Facility has not submitted notification of completion of installation of the heat treat oven.

During this inspection, the facility was unable to produce emission records.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition 1,2, and 3 of PTI number 458-89C and Special Condition VI.1 of PTI number 11-20.

The conditions of PTI number 458-89C require emissions records of nitric acid, phosphoric acid, and sodium hydroxide, and the conditions of PTI number 11-20 require daily pressure drop readings, which shall be made available for review upon request by the AQD staff.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 7, 2021 (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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If WKW Extrusion, Erbsloeh Aluminum Solutions, 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 violations cited above and for the cooperation that was extended to me during my inspection of the facility. 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,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
269-312-2535

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