



November 25, 2016

Mr. Mike Kovalchick Air Quality Division 301 East Louis Glick Highway Jackson, Ml. 49201

Dear Mr. Kovalchick,

This is a response for the violation notice dated Nov. 3, 2016.

I am unable to get an exact date of when the phosphate coating line was installed. I am still trying to locate historical documentation of when that was. There was a fire in that department around 1970, so it would have had to be after the rebuild process was complete. We have been using a Manganese phosphate product in this line since 1992, which is the earliest MSDS sheet I could locate. The original tank was 1000 gallons and we are now running with a tank containing 300 gallons at the same process percentages.

Camshaft had been operating the phosphate line with the understanding we were exempt under Rule 290 of the permit to install exemption. The last inspection from 3/20/2012 confirmed that all permits had been voided and Camshaft Machine was still in compliance. All permit requirements appeared to be voided in March of 1994.

Camshaft did not intended to violate or operate without the required permitting from the Michigan Department of Environmental Quality. We are in the process of contacting outside environmental agencies we have previously used to help us understand all requirements and to file all the appropriate and complete permit application data. Camshaft Machine does not have the required expertise in house to complete the application. We know the process and building parameters, but we lack the knowledge for other requirements.

I will expect to have the permit data ready for submission by Jan 1<sup>st</sup>, 2017. If you have any questions, please call me at (517) 990-3016.

Regards,

Jason Walsh

**Facilities Manager** 

Camshaft Machine Company

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