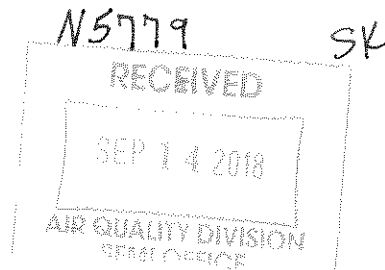




6125 18 Mile Road
Sterling Heights, MI 48314



September 12, 2018

Mr. Sebastian G. Kallumkal
Senior Environmental Engineer
Air Quality Division
Michigan Department of Environmental Quality
Southeast Michigan District
27700 Donald Court
Warren, Michigan 48092

RE: VIOLATION NOTICE SRN: N5779, MACOMB COUNTY

Dear Mr. Kallumkal,

On September 5, 2018, Mr. Ross St.Onge received a letter from the MDEQ dated August 29, 2018 regarding a Violation Notice for PIT 85-17 associated with EU-F2. In the letter you specified two potential violations as described below:

Process Description	Rule/Permit Condition Violated	Comments from MDEQ	Response from Acument
EU-F2	PTI No. 85-17, SC I.1	At the time the PTI was reviewed a VOC emission factor of 0.374 lb/ton of metal processed was used. Based on the emission factor VOC emissions from EU-F2 was limited to 3.3 tons per year. The stack test report indicated that the actual VOC emission factor is 0.890 lb/ton of metal processed. Based on this emission factor and material process limit of 17,520 tons per year, the annual VOC emission is calculated to be 7.8 tons.	The VOC Emission test report completed by BTEC on July 26, 2018 did measure a higher emission limit than what was used in the initial modeling by the MDEQ for the PTI 85-17 (0.89 lb/ton vs. 0.374 lb/ton). However, the current process rate YTD has been 1,833 pounds of metal processed per hour, and not 4,000 pounds per hour. We have completed a calculation for 2018 to estimate actual YTD plus estimated year end emissions to show that we will be right at the current permit limit of 3.3 tons per year, and we will adjust production as needed to adhere to these limits (see attached Table 1). In addition, Acument is in the process of submitting a permit modification request to raise the VOC tons per year limit to the the needed 7.8 tons. We have been in contact with David Thompson who was the initial permitting engineer for assistance on the process and anticipate the permit modification request be complete and sent into the MDEQ by September 26, 2018. We will also raise our stack height for these 2 emission points if needed. Once a more complex modeling has been completed by the AQD, if needed we will move

			forward with any required stack modification.
EU-F2	PTI No. 85-17, SC VII.1	The PTI requires that within 30 days after completion of the installation of EU-F2, the permittee shall notify the AQD District Supervisor in writing, of the completion of the activity. The permittee failed to inform the AQD about the completion of installation of EU-F2.	On Wednesday January 24th, Allison Zombo, EHS Supervisor for Acument contacted Ms. Joyce Zhu, informing the MDEQ that the trail operation for EU-F2 began trail operations on January 2, 2018 and that installation was complete on December 29, 2017. A copy of this correspondence is attached.

If you have any questions or require additional information, please contact me directly on my cell phone 810-730-4520 or e-mail at acook@acument.com.

Sincerely,



Ross St. Onge
EHS Supervisor, Sterling Heights Plant
586-997-5548



Angela Cook, PE, CSP
Michigan Regional EHS Manager
810-730-4520

CC via USPS mail:
Ms. Jenine Camilleri
Enforcement Unit Supervisor
MDEQ - Air Quality Division
P.O. Box 30260
Lansing, MI 48909-7760