MPG
PERFORMANCE DRIVEN

May 26, 2016

Mr. Tyler Salamasick
Environmental Quality Analyst
Department of Environmental Quality
Air Quality Division
27700 Donald Court
Warren, Michigan 48092-2793

Re: Formtech Industries LLC Violation Notice

Dear Mr. Salamasick:

On May 5, 2016, we received a Violation Notice from your office regarding alleged air quality violations involving the single dust collector at our facility located at 18450 15 Mile Road, Fraser, Michigan. The Violation Notice listed two alleged violations involving the dust collector. It is our belief that the statements included in the Violation Notice are inaccurate and therefore, operation of the dust collector does not constitute violations of the rules indicated in the letter.

The first "Comment" in the Violation Notice states that, "AQD staff observed the filter associated with the steel shot blast equipment was not working. In addition, Mr. Parrish stated that in response to the complaint, Formtech was upgrading its' filtration system." This statement is true but not accurate in context. Yes, the dust collector was not operating during your visit on March 30, 2016, but neither was the one manufacturing line (Coining Cell) connected to the dust collector. The coining cell and in-line shot blast equipment was not operating due to 7.5 hours of unplanned down time during March 30 (see attached work center log). It is possible that the shot blast machine was running as maintenance was being performed but parts could not have been running through it. Also, the shot blast does not run parts without the dust collector operating. Otherwise, the dust to be collected by the dust collector would directly back-up into the inside of the building.

Secondly, the facility did contract with their outside vendor, Ingersoll Mechanical, to perform a review and upgrade of the dust collector. However, this was not because of any malfunction of the system, it was simply to ensure the dust collector was operating correctly and to look for ways to make it more robust. The dust collector was found to be operational but did require some system updates.

The second "Comment" in the Violation Notice states that, "AQD staff observed metallic fallout on neighboring property coming from Formtech's facility. AQD staff also observed metallic fallout directly off Formtech's baghouse." Through interviews with Mr. Ronald Parrish, Operations Manager at Formtech, he states there was absolutely no

plume of smoke or dust coming from the dust collector at any time he observed the dust collector and certainly not during your on-site visit.

Therefore, it is assumed your "Comments" regarding metallic fallout on the neighboring property is based upon the wipe samples you took from automobiles next door. Your samples were reviewed under a microscope by the City of Grand Rapids, Environmental Services Department (see attached City of Grand Rapids report dated 4/15/16). Their results were as follows:

Two samples (1600817 & 1600818) taken on March 30, 2016 – microscopic examination revealed "These particles are consistent with fallout from combustion." - There are no combustion related equipment on-site at Formtech (including the shot blast & dust collector). Therefore, any fallout materials found on any neighboring property could not have come from the dust collector or any manufacturing system at the Formtech facility.

Two samples (1600946 & 1600947) taken on March 30, 2016 – microscopic examination revealed "These particles are consistent with oxidized iron and metallic iron. Also noted was material consistent in properties with quartz." A third sample (1600948) was taken from the dust collector at Formtech. The microscopic examination revealed that "the majority of particles (90%) are silver color metallic particles, which are affected by a magnet. Black, opaque, rough, irregular, particles are also present." These results seemed to be fairly generic so in response to these samples, we contracted with Atwell to perform our own sampling.

Dust samples were taken by Atwell on May 16, 2016. Samples were taken from inside of the collection drum at the baghouse (SS-1); from directly below the dust collector, adjacent to the collection drum (WS-1); at the dust collector exhaust filter system cowling (WS-2); from the paved surface south of the baghouse (WS-3); from the paved surface east of the baghouse (WS-4); and near the southern property border (WS-5). Additionally, dust collected at a set of railroad tracks was supplied to Atwell for microscopic analysis.

Results of the Atwell sampling show that only the baghouse vent sample contained iron and magnesium, indicating that the other samples taken in the area are probably associated with the previous long term, outdoor storage of metallic materials. This would explain the rusty, orange color on the ground in this area. Further, Atwell collected a sample of the baghouse dust (SS-1) and found 15 different metals in the sample. When compared to the sample at the south property line (WS-5) approximately 150 feet away from the dust collector, there were only 4 metals identified at very low concentrations. This also supports the fact that any fugitive dust suggested by MDEQ is not likely to come from Formtech's dust collector.

These results indicate that any fugitive dust potentially coming from the Formtech dust collector are not making it to the property line (see attached Atwell report). Further, Atwell's microscopic examination of the railroad dust is almost identical ("Identifiable sample constituents include: cellulose, oxidized iron, magnetic iron, and quartz. The vast majority of sample consists of the oxidized iron and magnetic iron particles") to the results of samples taken from the neighboring vehicles (samples 1600946 & 1600947) by the AQD.

In conclusion, based upon the fact that the coining cell was experiencing down-time during your visit on March 30, 2016, the fact that the shot blast cannot operate without the dust collector running, and the results from samples taken and analyzed by Atwell, it is our firm belief that there is no evidence that Formtech's dust collector ever failed and that the samples AQD took from neighboring vehicles are the result of industrial fallout from other sources (rusting metal, brake dust, etc.), including potentially the railroad tracks in the area, and not the dust collector at Formtech. Therefore, we request that the Notification of Violation for Formtech be rescinded.

Thank you for your time with this matter.

Sincerely,

Dean Teeples
Vice President EHS
Metaldyne Performance Group Inc. (MPG)

Cc: Jennifer Dudley – Corporate Counsel
Brian Cicilian – Plant Manager Formtech Fraser
Ron Parrish – Operations Manager Formtech Fraser