



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHUR
DIRECTOR

August 2, 2018

Mr. Jake Kizer
Dicastal North America, Inc.
1 Dicstal Drive
Greenville, Michigan 48838

SRN: N7688, Montcalm County

Dear Mr. Kizer:

VIOLATION NOTICE

On April 4, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Dicastal North America, Inc. located at 1 Dicastal Drive, Greenville, Michigan. The purpose of this inspection was to determine Dicastal North America'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) number 78-15D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Aluminum Chip Dryer (EU-ChipDryer)	PTI No. 78-15D, EU-ChipDryer, Special Conditions I.1, I.2 and I.3	Exceedance of the pound per hour limit for PM, PM10 and PM2.5.
	PTI No. 78-15D, EU-ChipDryer, Special Condition IV.4	Failure to maintain a minimum thermal oxidizer VOC destruction efficiency of 95 percent.
	PTI No. 78-15D, EU-ChipDryer, Special Condition III.2; 40 CFR 63.1506(f)	Failure to maintain a minimum thermal oxidizer 3-hour block average temperature above 725 degrees Celsius.
	PTI No. 78-15D, EU-ChipDryer, Special Condition IV.2; 40 CFR 63.1510(d)	Failure to inspect each capture and collection system at least once each year.

During this inspection, it was determined that Dicastal North America Inc. failed to maintain the thermal oxidizer at a 3-hour block average temperature above 725 degrees Celsius on 16 occasions during the previous 12-month time period. Dicastal North America Inc. also failed to conduct an inspection of the capture and collection system associated with EU-ChipDryer at least once each year.

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Additionally, compliance test results submitted on July 11, 2018 documented exceedances of the PM, PM10 and PM2.5 hourly emission limits established in PTI No. 78-15D. The test results also showed that the thermal oxidizer was not achieving a minimum VOC destruction efficiency of 95 percent.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 23, 2018 (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 the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Dicastal North America 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 Dicastal North America Inc. 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,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-558-0616

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ