



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 4, 2020

Mr. Daniel Schwab, EHS Specialist
Dicastal North America, Inc.
1 Dicastal Drive
Greenville, Michigan 48838

SRN: N7688, Montcalm County

Dear Mr. Schwab:

VIOLATION NOTICE

On March 2, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the Subpart RRR semi-annual compliance report for Dicastal North America Inc. located at 1 Dicastal Drive, Greenville, Michigan. The compliance report documented parameter monitoring exceedances that occurred during the semi-annual period of July 1, 2019 – December 31, 2019. Additionally, on June 1, 2020, Dicastal provided additional information, including thermal oxidizer temperature records for the time period of January 31, 2020 – March 31, 2020.

The following violations were identified in the report:

Process Description	Rule/Permit Condition Violated	Comments
Aluminum Chip Dryer (EU-ChipDryer)	Permit to Install No. 78-15D, EU-ChipDryer, Special Condition III.1 and 2. 40 CFR 63.1506(f)	Failure to maintain a minimum thermal oxidizer 3-hour block average temperature above 730 degrees Celsius.

Review of the semi-annual records show that the aluminum chip dryer operated for 741 hours while the thermal oxidizer temperature was below the required 3-hour block average temperature of 730 degrees Celsius. Additionally, the thermal oxidizer temperature records for the time period of January 31, 2020 – March 31, 2020, document that the aluminum chip dryer operated for 1443 hours while the thermal oxidizer temperature was below the required 3-hour block average temperature.

The cited violations are also enforceable under Paragraphs 9.A.1 and 9.B.1 of Consent Order, AQD number 2019-21.

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On June 1, 2020, Dicastal provided an explanation of the cause, duration and corrective actions taken to resolve and prevent a reoccurrence of operation of the aluminum chip dryer while the thermal oxidizer temperature is below the minimum 3-hour average. Therefore, no additional response is required.

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 violation cited above. If you have any questions regarding the violation 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: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Heidi G. Hollenbach, EGLE